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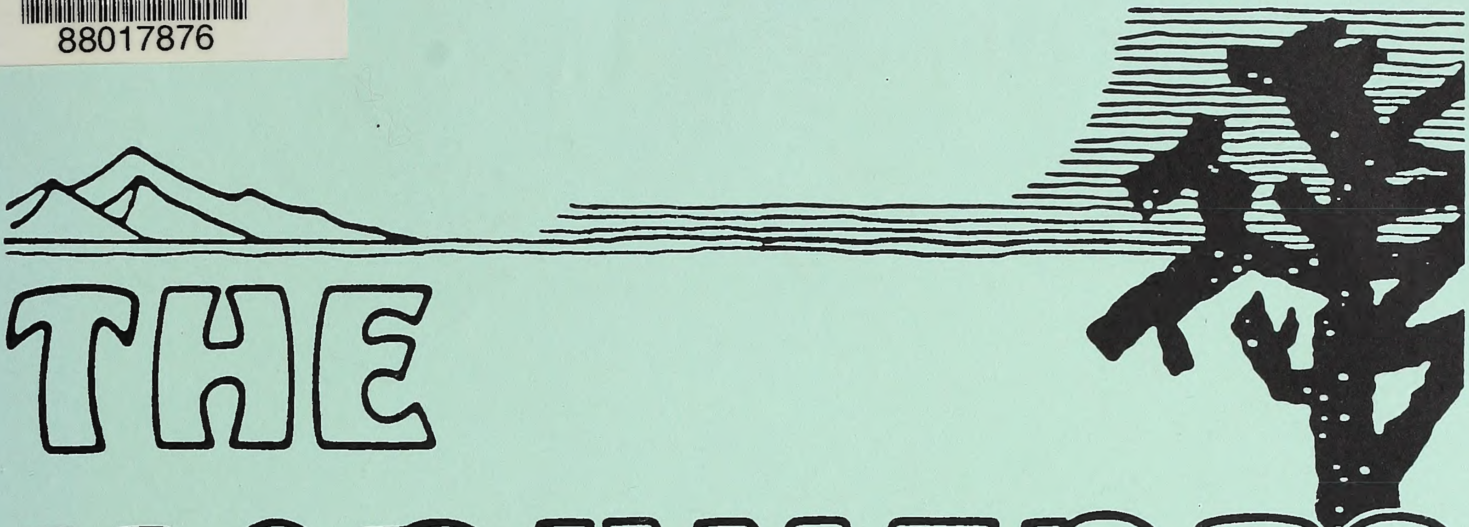

THE MONUMENTS

FINAL
ENVIRONMENTAL IMPACT STATEMENT

Boundary Adjustments:
Death Valley and
Joshua Tree
National Monuments

Bureau of Land Management
California Desert District

April 1989

March 3, 1849

IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT
1695 Spruce Street
Riverside, California 92507

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Dear Reader:

In 1988, the National Park Service (NPS) identified five proposed additions to the Death Valley and Joshua Tree National Monuments in California. The proposal was based upon issues associated with enhancing the manageability of NPS units, reducing administrative costs and facilitating resource management and protection.

A Draft Environmental Impact Statement was prepared, and based upon review of this draft, public input, recommendations of the California Desert District Advisory Council and consultation with NPS, a modification of the proposal was developed. Under this modification, four parcels would be added to Death Valley and Joshua Tree National Monuments and one parcel retained in the California Desert Conservation Area for management by the Bureau of Land Management. A collective total of 108,574 acres would be transferred to NPS. The modification and parcels are discussed in this Final Environmental Impact Statement.

To obtain additional copies of this document, please send your request to the following address:

Bureau of Land Management
California Desert District
ATTN: Monuments EIS
1695 Spruce Street
Riverside, California 92507

Sincerely,

Gerald E. Hillier
District Manager

Take pride in your California Desert Conservation Area . . .
A National Treasure.

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1989

ENVIRONMENTAL IMPACT STATEMENT
FOR
BOUNDARY ADJUSTMENTS
DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS

Prepared by

Lead Agency	Bureau of Land Management California Desert District
Cooperating Agency	National Park Service Joshua Tree National Monument Death Valley National Monument
Cooperating Agency	Bureau of Mines Western Field Office, Spokane

The Bureau of Land Management, in cooperation with the National Park Service and the Bureau of Mines, is considering the transfer five parcels of public lands currently managed by the Bureau to the Death Valley and Joshua Tree National Monuments. The purpose of the additions is to adjust the boundaries of the monuments so that they are more manageable, and so that natural areas and ecosystems currently bisected by the boundary are managed under a single jurisdiction.

As a result of the analysis conducted in the Draft EIS, public input and comment, and further consultation with the Park Service, four of the five parcels originally proposed for transfer will be transferred to the Park Service for a total of 108,574 acres. This is the Bureau and Park Service's Preferred Alternative. Since these lands were not designated for disposal in the Bureau's California Desert Conservation Area Plan and the management of a portion of these lands may differ, the transfer is being processed through a plan amendment in compliance with the Bureau's land use planning regulation (43 CFR 1610.5-3).

This EIS is the National Environmental Policy Act (NEPA) document necessary to process both the transfer and the plan amendment.

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California Desert District
1695 Spruce Street
Riverside, California 92507

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SUMMARY

Introduction

On May 19, 1988, the Western Regional Office of the National Park Service proposed to the California State Office of the Bureau of Land Management (BLM) that five parcels of land currently under BLM jurisdiction be transferred to the Joshua Tree and Death Valley National Monuments. The parcels, and the acreage of each, follow:

Parcel 1: North Death Valley, on the extreme north end of Death Valley National Monument, 84,389 acres. This area is a topographic extension of Death Valley, and its transfer would enhance its manageability.

Parcel 2: Hunter Mountain, on the western boundary of Death Valley National Monument, 26,687 acres. Inclusion of this parcel in the monument would bring all of Hunter Mountain under the jurisdiction of a single agency.

Parcel 3: Pyramid Peak, on the eastern boundary of Death Valley National Monument, 14,268 acres. A more definable monument boundary would be established and the entirety of Red Amphitheater and Pyramid Peak would be brought within the monument.

Parcel 4: Greenwater Valley, on the eastern boundary of Death Valley National Monument just south of Pyramid Mountain, 117,505 acres. Transfer of the large Greenwater Valley Parcel would bring the entire Black Mountain watershed within the monument, and would establish a readily identifiable road as the monument's eastern boundary.

Parcel 5: Pinto Basin, on the southern boundary of Joshua Tree National Monument, 4,480 acres. This proposed BLM wilderness area is topographically related to adjacent Monument lands.

Amendment to California Desert Conservation Area Plan

BLM's planning regulations require that all actions must conform to the approved land use plan. "If a proposed action is not in conformance, and warrants further consideration before a plan revision is scheduled, such consideration shall be through a plan amendment" (43 Code of Federal Regulations (CFR) 1610.5-3). Since the lands now proposed for transfer under the Bureau's Preferred Alternative were originally designated for retention under the Bureau's California Desert Conservation Area Plan, their disposal is not in conformance with the Plan. To this end, the transfer is being processed as an amendment to the Desert Plan. This EIS is the NEPA document necessary to process both the transfer and the plan amendment.

Issues

Ten issues have been considered. These are briefly summarized below:

1. The effect of transferring jurisdiction on sensitive wildlife species, particularly the Desert Bighorn Sheep.
2. The effects on sensitive plants, particularly at the Sand Spring area of critical environmental concern.
3. The continued viability of grazing operations, particularly on Hunter Mountain.
4. The future of BLM and Park Service wild horse and burro management and removal programs.
5. Availability of Hunter Mountain to Native Americans for harvesting pinyon nuts. Management of historic and prehistoric cultural sites.
6. Status of existing land use authorizations (e.g. rights of way for utility lines and roads, public water reserves) under Park Service management.
7. Capability of each agency to establish and maintain a field presence in the parcels.
8. The future of hunting, trapping, camping, and motorized vehicle access.
9. Effects of transferring parcels recommended for wilderness designation.
10. The effect of transferring jurisdiction on future mineral development of the parcels. BLM and Park Service mineral regulations are significantly different. Greatest effects would occur in the Hunter Mountain, Greenwater Valley, and Eagle Mountain Alternative parcels.

Alternatives Studied

Six alternatives are considered in detail by the environmental impact statement. These include the following:

Alternative A: Park Service proposal.

Modified Alternative A: BLM/NPS preferred alternative

Alternative B: Modified Greenwater Valley parcel (excluding a highly mineralized area in the Ibex Hills).

Alternative C: Eagle Mountains Alternative (an additional 25,000 acres proposed for transfer adjacent to the Pinto Basin parcel).

Alternative D: Modified Pyramid Peak parcel. Includes an additional portion of BLM's Funeral Mountains wilderness study area.

Alternative E: No Action (lands would not be transferred, but would continue to be managed by BLM under the guidance of the California Desert Conservation Area Plan).

Major Impact Conclusions

Table S-1 summarizes the impacts that would result from implementation of each of the five alternatives.

Modification of the BLM Preferred Alternative

The FEIS includes several changes to the preferred alternative identified in the DEIS. The changes were made to improve management effectiveness, based on consideration of resource data, further review of management and administrative needs, organizational changes occurring since the DEIS and conclusions made in response to public review. These changes are within the scope of analysis presented in the DEIS and will create no significant new environmental impacts.

The changes as summarized below affect three parcels of the five parcels included in Alternative A of the DEIS. A more detailed description of the modified, preferred alternative is contained in Chapter 2. The analysis of possible environmental impacts is included in Chapter 4.

Modifications to Preferred Alternative by Parcel

Parcel 1	North Death Valley:	Same as DEIS preferred alternative.
Parcel 2	Hunter Mountain:	Retained in the CDCA for management by Bureau of Land Management and not transferred as in DEIS preferred alternative.
Parcel 3	Modified Pyramid Peak:	Same as DEIS preferred alternative.
Parcel 4	North Greenwater Valley:	A modification of DEIS preferred alternative transferring 7387 acres of triangular parcel at north end of Greenwater Valley to facilitate management and retain the balance of Greenwater Valley within the CDCA for management by Bureau of Land Management.
Parcel 5	Modified Pinto Basin:	A modification of DEIS preferred alternative by moving the east boundary about one-quarter miles east and thereby transferring an additional 320 acres.

Table S-1
Summary of Impacts[1]

Resource	Alternative A by Parcel[2] (Proposed Action)					Alternative			Alternative E by Parcel (No Action Alt.)					Modified Alternative A[3] (Preferred Alt.)				
	1	2	3	4	5	B	C	D	1	2	3	4	5	1	2	3	4	5
Wildlife	0	+	0	-	+	-	+	0	-	-	+	+	0	0	-	+	+	+
Botany	+	0	+	+	+	+	+	+	+	0	0	0	+	+	0	+	0	+
Grazing	-	-	0	0	0	0	0	0	0	+	0	0	0	-	+	0	0	0
WH&B	0	-	-	0	0	0	0	-	0	0	0	0	0	0	0	-	0	0
Cult Res	+	+	+	+	+	+	+	+	0	0	0	0	0	+	0	+	0	+
Lands	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Airspace	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recreation																		
Primitive	+	+	0	0	+	0	+	0	0	0	0	0	+	+	0	0	0	+
Vehicular	0	-	-	0	0	0	--	-	0	0	-	0	0	0	0	-	0	0
Hunting	-	-	0	0	0	0	-	0	0	0	0	0	0	-	0	0	0	0
Harvest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Wilderness	0	0	0	+	+	+	+	0	0	0	0	-	-	0	0	0	-	+
GEM																		
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Minerals	-	--	-	--	0	-	--	-	0	0	0	0	0	-	0	-	0	0

[1]
++ Highly positive impact
+ Slightly positive impact
0 Neutral impact
- Slightly negative impact
-- Strongly negative impact

[2]
1 North Death Valley
2 Hunter Mountain
3 Pyramid Peak
4 Greenwater Valley
5 Pinto Basin

[3]
1 North Death Valley
2 Hunter Mountain
3 Modified Pyramid Peak
4 North Greenwater Valley
5 Modified Pinto Basin

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CHAPTER 1

INTRODUCTION

CHAPTER 1

INTRODUCTION

LOCATION

On May 19, 1988 the National Park Service proposed five specific boundary adjustments to the Death Valley and Joshua Tree National Monuments in Southern California. This proposal marked the culmination of several months of discussions between the Park Service and the Bureau of land management to improve the manageability of the monument's borders. It is consistent with the goals of the 1987 memorandum of agreement between the two agencies concerning the addition of public lands managed by the Bureau to the National Park Service.

As a result of the adjustments, 247,329 acres of public lands currently under Bureau of Land Management (BLM) administration would be transferred to the Park Service for inclusion in the two Monuments (see maps 1-1 and 1-2). A total of 242,849 acres would be transferred to Death Valley, while the remaining 4,480 acres would be transferred to Joshua Tree National Monument.

The parcels, and the acreage of each, follow:

Parcel 1: North Death Valley, on the extreme north end of Death Valley National Monument, 84,389 acres.

Parcel 2: Hunter Mountain, on the western boundary of Death Valley National Monument, 26,687 acres.

Parcel 3: Pyramid Peak, on the eastern boundary of Death Valley National Monument, 14,268 acres.

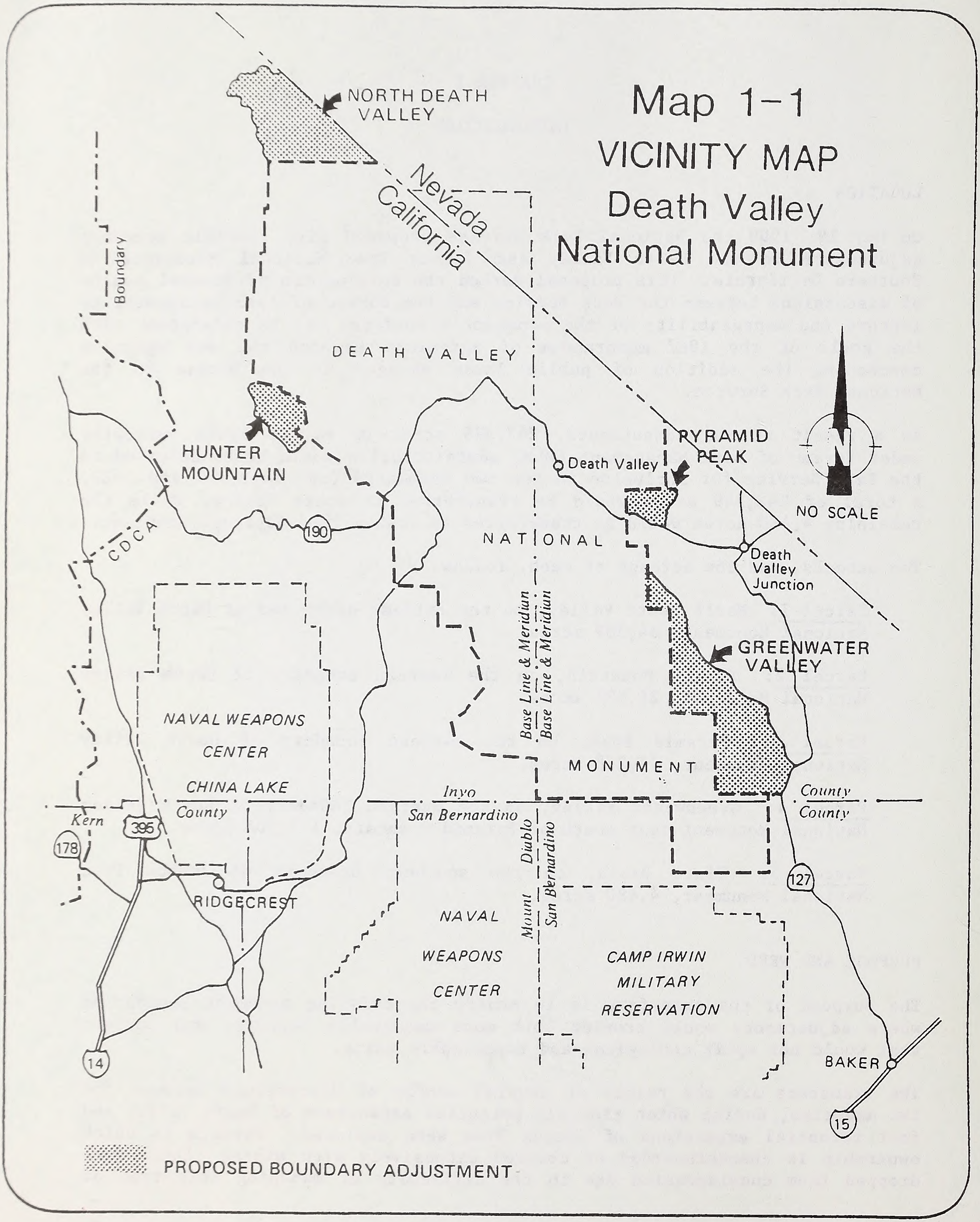
Parcel 4: Greenwater Valley, on the eastern boundary of Death Valley National Monument just south of Pyramid Mountain, 117,505 acres.

Parcel 5: Pinto Basin, on the southern boundary of Joshua Tree National Monument, 4,480 acres.

PURPOSE AND NEED

The purpose of the transfers is to modify the existing monument boundaries where adjustments would provide both more manageable borders, and borders that would not split ecological and topographic units.

The transfers are the result of several months of discussions between the two agencies, during which time six potential expansions of Death Valley and four potential expansions of Joshua Tree were explored. Parcels in which ownership is checkerboarded or covered extensively with mining claims were dropped from consideration due to the difficulty of managing this type of



Map 1-1
VICINITY MAP
Death Valley National Monument

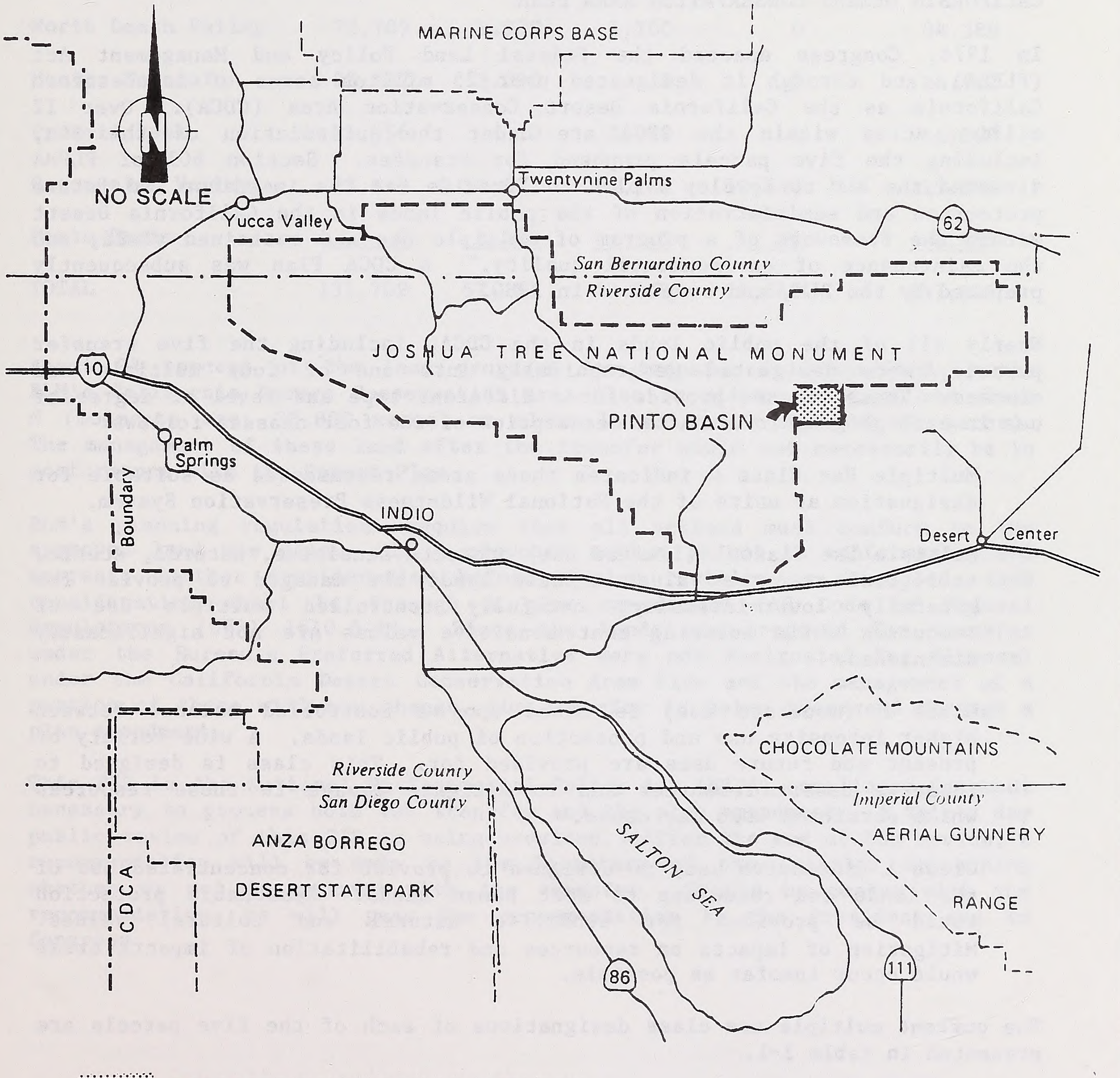
NORTH DEATH VALLEY
Nevada
California
Boundary
DEATH VALLEY
NATIONAL
MONUMENT
HUNTER MOUNTAIN
PYRAMID PEAK
Death Valley
Death Valley Junction
NO SCALE
N
GREENWATER VALLEY
CDCA
190
Base Line & Meridian
Base Line & Meridian
NAVAL WEAPONS CENTER
CHINA LAKE
Inyo
County
County
Kern
County
San Bernardino
County
395
178
RIDGECREST
Mount Diablo
San Bernardino
NAVAL WEAPONS CENTER
CAMP IRWIN MILITARY RESERVATION
127
14
BAKER
15

▨ PROPOSED BOUNDARY ADJUSTMENT

Map 1–2

VICINITY MAP

Joshua Tree National Monument


NO SCALE
MARINE CORPS BASE
Twentynine Palms
Yucca Valley
62
San Bernardino County
Riverside County
JOSHUA TREE NATIONAL MONUMENT
10
PINTO BASIN
Palm Springs
Boundary
INDIO
Desert Center
CHOCOLATE MOUNTAINS
Riverside County
San Diego County
Imperial County
AERIAL GUNNERY
RANGE
SALTON SEA
ANZA BORREGO
DESERT STATE PARK
CDCA
86
111
▨ PROPOSED BOUNDARY ADJUSTMENT

land pattern and the high cost of resolving the claims. Other parcels were dropped where it was felt that their inclusion would not enhance the management of either the parcels or the monuments. The five parcels to be analyzed in detail by this environmental impact statement (EIS) are those which were determined to be the most feasible by that preliminary screening process.

The National Park Service formally proposed the boundary adjustments to the Bureau on May 19, 1988.

CALIFORNIA DESERT CONSERVATION AREA PLAN

In 1976, Congress enacted the Federal Land Policy and Management Act (FLPMA), and through it designated over 25 million acres of southeastern California as the California Desert Conservation Area (CDCA). Over 12 million acres within the CDCA are under the jurisdiction of the BLM, including the five parcels proposed for transfer. Section 601 of FLPMA directed the BLM to develop a plan to "provide for the immediate and future protection and administration of the public lands in the California Desert within the framework of a program of multiple use and sustained yield, and the maintenance of environmental quality." A CDCA Plan was subsequently prepared by the BLM, and completed in 1980.

Nearly all of the public lands in the CDCA, including the five transfer parcels, were designated geographically into one of four multiple use classes. These classes provide for a different type and level or degree of use in each geographic area. A description of the four classes follows:

> Multiple Use Class C indicates those areas recommended as suitable for designation as units of the National Wilderness Preservation System.
>
> Multiple Use Class L (limited use) protects sensitive, natural, scenic, ecological resource values. These lands are managed to provide for generally lower-intensity, carefully controlled multiple use of resources while ensuring that sensitive values are not significantly diminished.
>
> Class M (moderate use) is based upon a controlled balance between higher intensity use and protection of public lands. A wide variety of present and future uses are provided for. This class is designed to conserve desert resources and to mitigate damage to those resources which permitted uses may cause.
>
> Class I (intensive use) is designed to provide for concentrated use of the lands and resources to meet human needs. Reasonable protection would be provided for sensitive natural and cultural values. Mitigation of impacts on resources and rehabilitation of impacts areas would occur insofar as possible.

The current multiple use class designations of each of the five parcels are presented in table 1-1.

About 76 percent of the lands proposed by the Park Service for transfer were designated as either class C (131,702 acres) or class L (57,181 acres). Management under National Park Service would generally be in conformance with class C and L guidelines.

Table 1-1
Multiple Use Class Designations
(in acres)

Parcel	Class C	Class L	Class M	Class I	Total
North Death Valley	72,709	9,920	1,760	0	84,389
Hunter Mountain	23,597	3,090	0	0	26,687
Pyramid Peak	11,956	0	2,312	0	14,268
Greenwater Valley	23,440	39,691	34,728	19,646	117,505
Pinto Basin	0	4,480	0	0	4,480
TOTAL	131,702	57,181	38,800	19,646	247,329

About 24 percent of the land proposed for transfer is classified by the BLM's California Desert Conservation Area Plan as either multiple use class M (moderate use; 38,800 acres) or class I (intensive use; 19,646 acres). The management of these land after the transfer would not necessarily be in conformance with the Desert Plan.

BLM's planning regulations require that all actions must conform to the approved land use plan. "If a proposed action is not in conformance, and warrants further consideration before a plan revision is scheduled, such consideration shall be through a plan amendment" (43 Code of Federal Regulations (CFR) 1610.5-3). Since the lands now proposed for transfer under the Bureau's Preferred Alternative were not designated for disposal under the California Desert Conservation Area Plan and the management of a portion of these will now change, the transfer is being processed through a plan amendment.

This EIS is the National Environmental Policy Act (NEPA) compliance document necessary to process both the transfer and the plan amendment. A thirty day public review of this EIS is being provided. After the end of the review, a recommendation will be made to the Secretary of the Interior concerning whether or not to proceed with the transfer. Should he concur with the recommendation, he will pass the recommendation to the President and to Congress.

NATIONAL PARK SERVICE MISSION

If the lands were to be transferred, they would be managed subject to the mission of the National Park Service (NPS). The National Park Service mission differs fundamentally from the multiple use mandate of the BLM. The Act of August 25, 1916, which outlines the broad policy framework for Park Service management, states that the NPS "shall promote and regulate the use of the Federal areas known as national parks, monuments and reservations...by such means and measures as to conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations".

In management of its designated areas to realize this legislative mandate, the Park Service necessarily stresses preservation of resources and restoration of natural conditions. Economic activities such as livestock grazing and mining are generally not consistent with preservation of park values or restoration of natural conditions. Where such uses are authorized, they must be closely controlled to ensure that resource values are not permanently impaired.

Likewise, some recreational activities are incompatible with protection of natural values. Activities such as off-road vehicle operation result in surface disturbance which can damage natural values and affect visual quality.

Wildlife management in the national parks is oriented toward restoration of natural habitat condition and natural population levels.

ISSUES SELECTED FOR ANALYSIS

The following are the critical issues this plan amendment addresses. Although a wide variety of resource impacts will be assessed, the analysis will focus on these issues.

Wildlife

The transfer may affect the way the Federal government manages wildlife, particularly desert bighorn sheep. For example, several wildlife guzzlers (artificial watering sources) have been installed, and are being maintained, in the parcels. The Park Service would maintain the guzzlers but, should the guzzlers be destroyed by a catastrophic event, they would not be replaced.

Botany

An unusual plant assemblage occurs in the North Death Valley parcel, at the Sand Spring and Little Sand Spring Area of Critical Environmental Concern. One BLM sensitive plant occurs in the Pinto Basin parcel.

Livestock Grazing

A portion of the North Death Valley parcel is within the Last Chance grazing allotment. The Hunter Mountain parcel is the key component of the Hunter Mountain grazing allotment. Although the Hunter Mountain parcel contributes only a portion of the forage produced by the Hunter Mountain allotment, it contains all of the permanent sources of water. Livestock grazing in the parcels would eventually be discontinued after transfer, creating possible impacts to the current grazing lessee.

Wild Horse and Burro

There has been historic wild horse and burro use of the North Death Valley and Hunter Mountain allotments, resulting in numerous impacts on other resources. Several thousand animals have been removed from these parcels in the past few years. However, animals continue to drift into the parcels from outside, so an ongoing removal program is necessary (and underway). Both BLM and Park Service removal policies need to be addressed.

Cultural Resources

Numerous sensitive archaeological sites occur in the parcels. The degree to which an agency can successfully patrol these areas and prevent their deterioration is an important transfer consideration. In addition, Native Americans are concerned about their continued ability to harvest pinyon nuts on Hunter Mountain if it were under Park Service jurisdiction.

Lands

Several existing land use authorizations (for example, rights of ways for utility lines and roads, and public water reserves) have been granted in the parcels, and might be affected by the transfer. The parcels are used by the military for research activities and for low-level military aircraft training exercises. The transfers may or may not be consistent with the Inyo and Riverside County general plans and the BLM CDCA plan.

Management Presence

The capabilities of each agency to establish a field presence in the parcels needs to be examined. The Park Service historically has been able to place more employees in the area of the parcels, but the recent doubling of BLM's ranger force and placing them in critical locations has significantly improved BLM's management presence.

Recreation

Existing vehicle access to the parcels (particularly Greenwater Valley) may or may not continue after a parcel is transferred. Hunting and trapping are popular on Hunter Mountain, but would be prohibited under Park Service management. Undesignated vehicle camping sites exist on Hunter Mountain, and could be replaced with designated sites, or might be phased out entirely.

Wilderness

About 53 percent of the parcels have been recommended by BLM as suitable for designation as units of the National Wilderness Preservation System. The percentage could change after transfer. A different management policy by Park Service could affect activities permissible in BLM wilderness.

Geology-Energy-Minerals

The transfer of these areas to Park Service management would curtail future mineral exploration or development of the parcels. Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. This issue would be particularly significant in the Hunter Mountain, Greenwater Valley, and Eagle Mountain Alternative parcels.

CHAPTER 2

ALTERNATIVES

CHAPTER 2

ALTERNATIVES

ALTERNATIVE A:
PROPOSED ACTION

Five parcels of land currently administered by the Bureau of Land Management, United States Department of the Interior, would be transferred to the National Park Service, United States Department of the Interior. Four of the parcels would be added to the Death Valley National Monument, and one parcel would be added to the Joshua Tree National Monument. All five parcels are adjacent to the Monuments.

A description of each of the five parcels follow, together with a summary of the rationale for transfer provided by the Park Service in its May 19, 1988 proposal.

Parcel 1: North Death Valley

Description

Location and Size: This parcel lies immediately north of Death Valley National Monument (see map 2-1). It is bounded on the west by the crest of the Last Chance Range, on the north by a road, on the east by the California-Nevada state line, and on the south by the monument. It consists of 84,389 acres.

Existing Classification: The CDCA plan designated 72,709 acres as class C (suitable for wilderness), 9,920 acres as class L (limited use), and 1,720 acres as class M (moderate use).

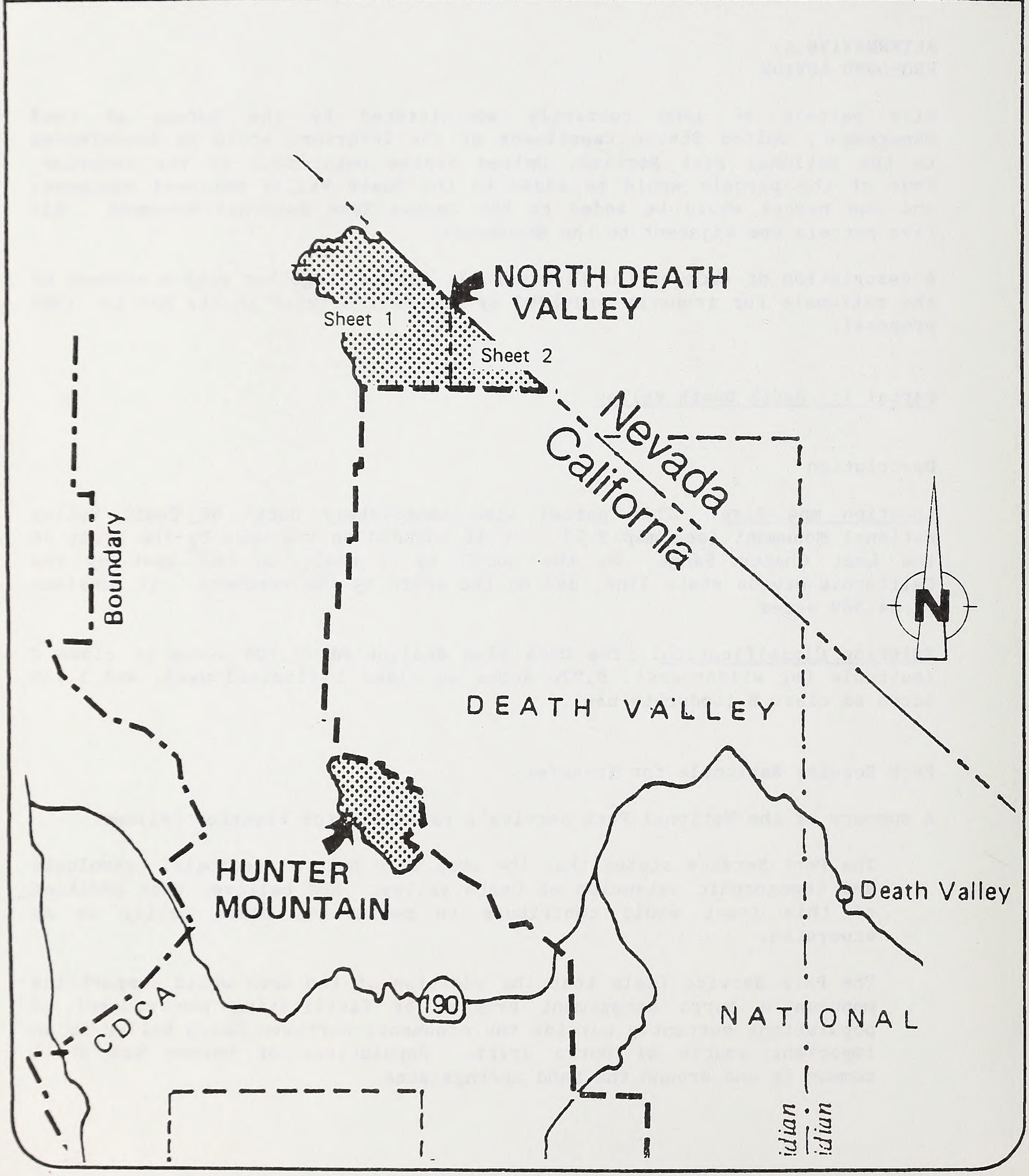
Park Service Rationale for Transfer

A summary of the National Park Service's rationale for transfer follows:

> The Park Service states that the area is a natural geologic, hydrologic and topographic extension of Death Valley. NPS believes that addition of this tract would contribute to perfecting Death Valley as an ecosystem.
>
> The Park Service feels that the addition of the area would support the monument's burro management program by facilitating the control of populations currently outside the monument; northern Death Valley is an important source of burro drift. Populations of burros are still common in and around the Sand Springs area.

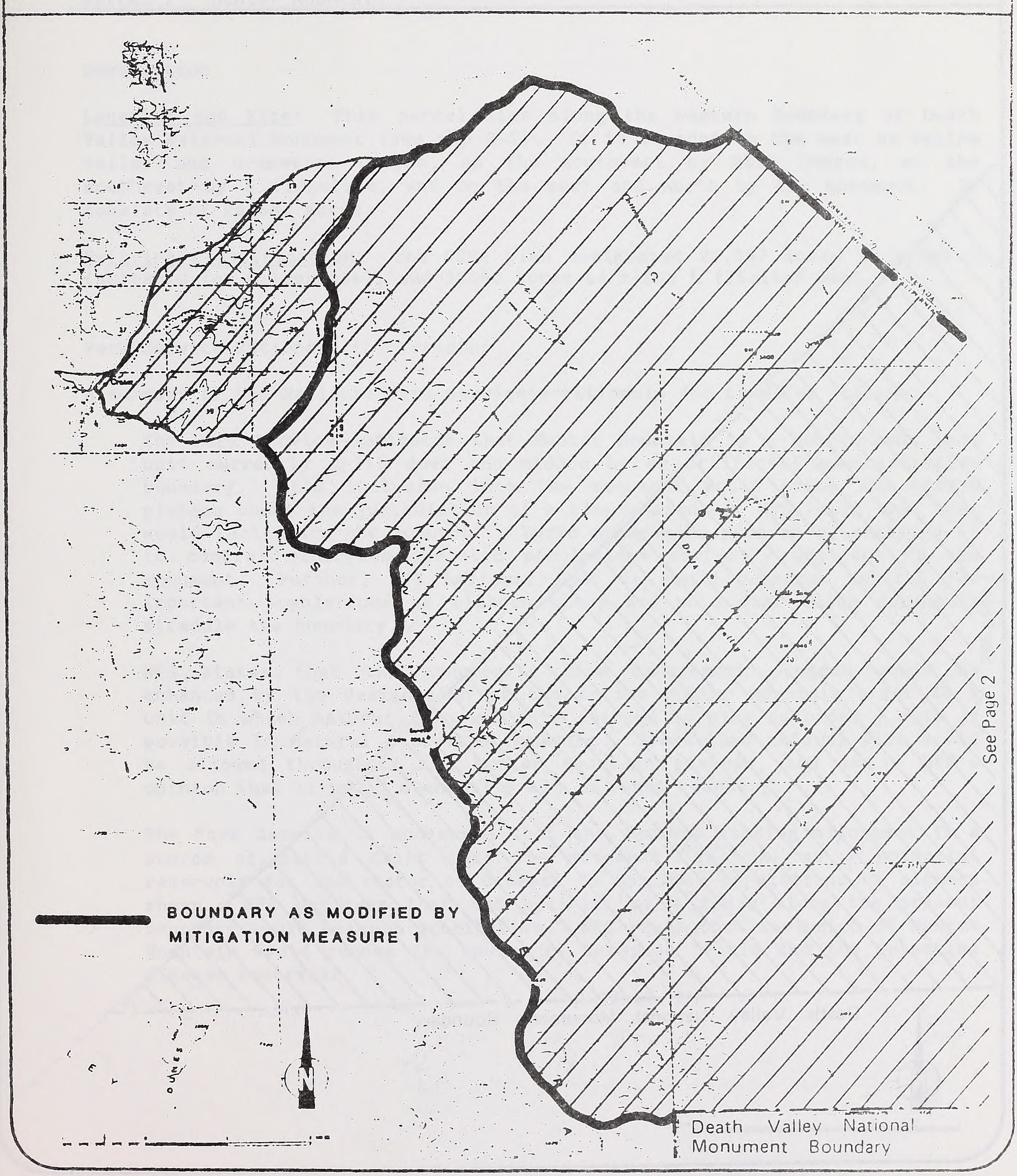
North Death Valley Index

MAP 2-1


NORTH DEATH VALLEY
Sheet 1
Sheet 2
Nevada
California
Boundary
N
DEATH VALLEY
HUNTER MOUNTAIN
Death Valley
190
CDCA
NATIONAL
idian
idian

North Death Valley

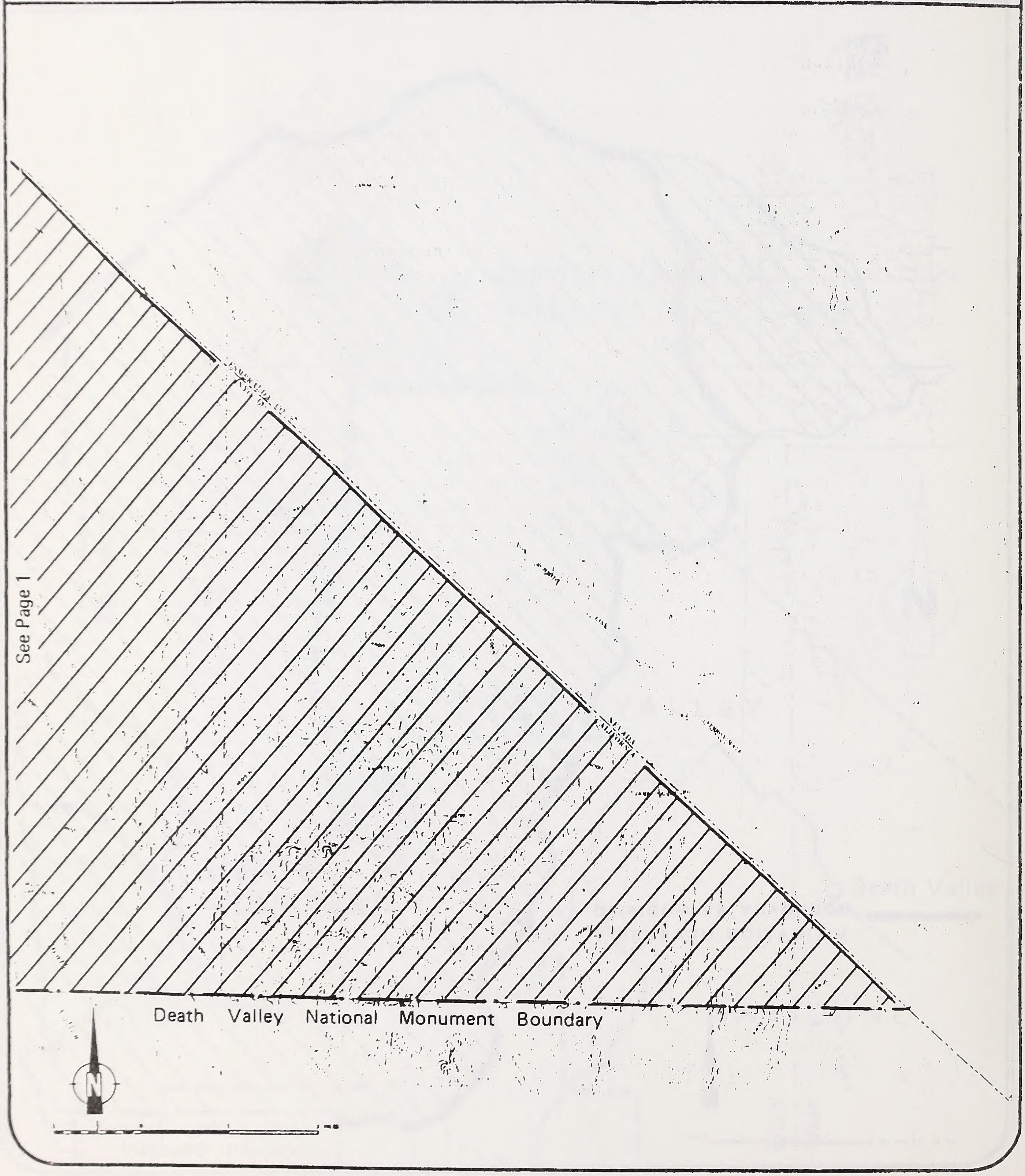
MAP 2-1


BOUNDARY AS MODIFIED BY MITIGATION MEASURE 1
Death Valley National Monument Boundary
See Page 2
NEVADA
CALIFORNIA
N

Sheet 1 of 2

North Death Valley

MAP 2-1


See Page 1
Death Valley National Monument Boundary
N

Sheet 2 of 2

> The Park Service believes that inclusion of the area would facilitate bighorn sheep population management by blocking up habitat on the east side of the last chance range.

Parcel 2: Hunter Mountain

Description

Location and Size: This parcel lies along the western boundary of Death Valley National Monument (see map 2-2). It is bounded on the west by Saline Valley and Grapevine Canyon, on the southwest by Mill Canyon, on the southeast by a ridgeline, and on the east and north by the monument. It consists of 26,687 acres.

Existing Classification: The CDCA plan designated 23,597 acres as class C (suitable for wilderness), and 3,090 acres as class L (limited use).

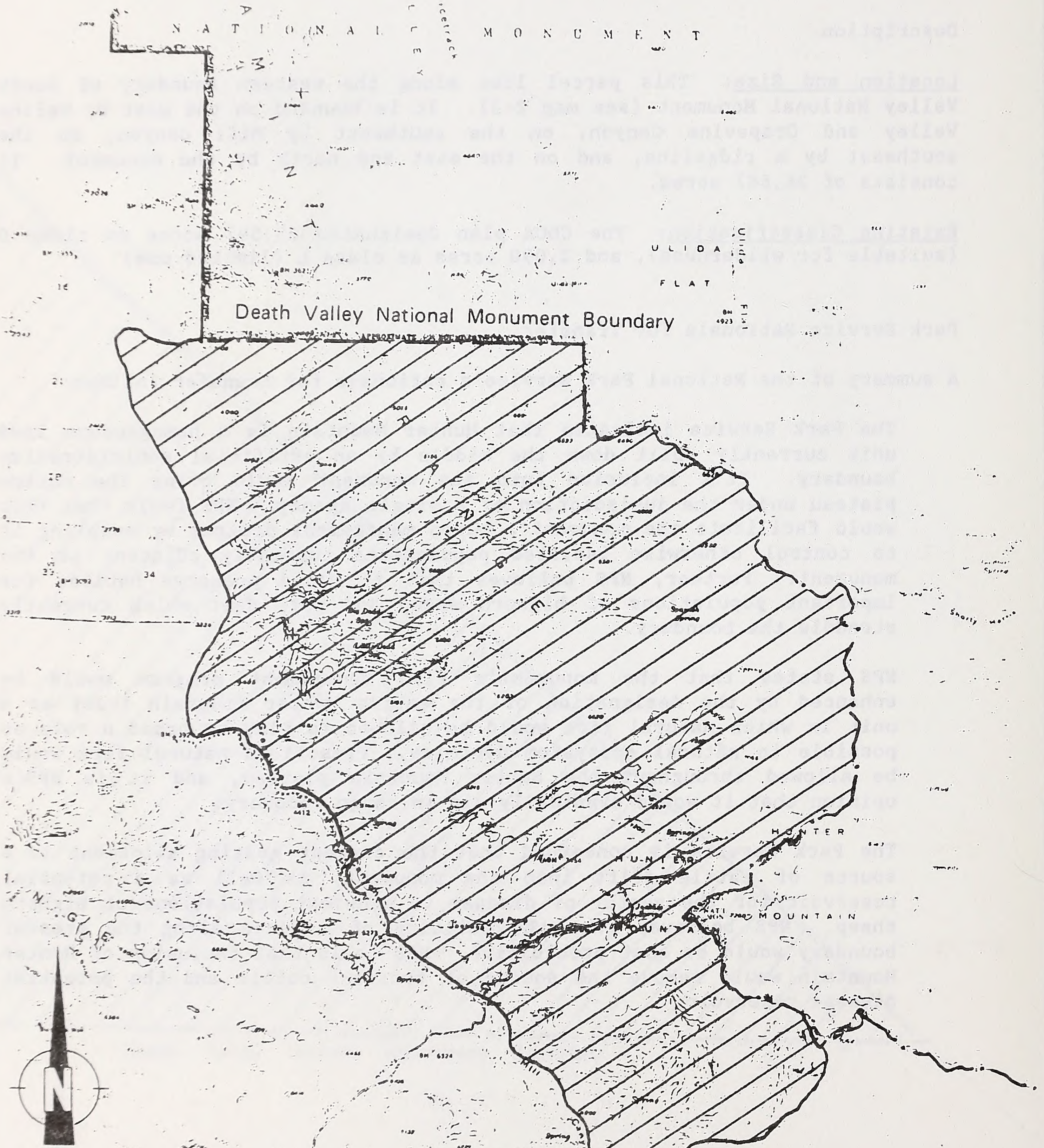
Park Service Rationale for Transfer

A summary of the National Park Service's rationale for transfer follows:

> The Park Service indicates that Hunter Mountain is a homogeneous land unit currently split down the middle by an artificial administrative boundary. It's inclusion into the monument would bring the entire plateau under the jurisdiction of a single agency. NPS feels that this would facilitate the monument's burro management program by enabling it to control otherwise isolated populations currently adjacent to the monument. Further, NPS believes that it would preserve habitat for important populations of bighorn sheep and mule deer which currently straddle the boundary.
>
> NPS states that the monument's fire management program would be enhanced by the designation of the entire Hunter Mountain tract as a unit in which natural fire would be allowed to play as broad a role as possible in natural ecosystem dynamics. Prescribed natural fire would be allowed throughout the Hunter Mountain plateau, and it is NPS's opinion that it would eventually aid in range recovery.
>
> The Park Service is concerned that the current grazing allotment is a source of cattle drift into the monument, as well as a potential reservoir for the vector of disease to monument populations of bighorn sheep. NPS believes that the building of a fence along the present boundary would be cost prohibitive. NPS feels that inclusion of Hunter Mountain would remove the source of trespass cattle and the potential disease reservoir.

HUNTER MOUNTAIN

MAP 2-2


NATIONAL MONUMENT
ULIDA FLAT
Death Valley National Monument Boundary
RANGE
HUNTER MOUNTAIN
N

Parcel 3: Pyramid Peak

Description

Location and Size: This parcel lies along the eastern boundary of Death Valley National Monument (see map 2-3). It is bounded on the north and west by the monument, on the south by state highway 190, and on the east by a drainage through and the east slope of the Funeral Mountains. It consists of 14,268 acres.

Existing Classification: The CDCA plan designated 11,956 acres as class C (suitable for wilderness), and 2,312 acres as class L (limited use).

Park Service Rationale for Transfer

A summary of the National Park Service's rationale for transfer follows:

> The Park Service states that access to other parts of the monument could be managed better if this parcel were transferred, and would produce a more recognizable patrol and management boundary. The new boundary follows a more natural break in the topography: the entirety of Red Amphitheater, Pyramid Peak, and the Funeral Mountains would be included within the monument. In addition, NPS believes that more cohesive management would be provided for a population of bighorn sheep which currently straddles the BLM-monument boundary.

Parcel 4: Greenwater Valley

Description

Location and Size: This parcel lies along the eastern boundary of Death Valley National Monument, south of parcel 3 (see map 2-4). It is bounded on the west and south by the monument, on the southeast by state highway 127, and on the northeast by the Furnace Creek Wash Road. It consists of about 117,505 acres.

Existing Classification: The CDCA plan designated 23,440 acres as class C (suitable for wilderness), 39,691 acres as class L (limited use), 34,728 acres as class M (moderate use), and 19,646 acres as class I (intensive use).

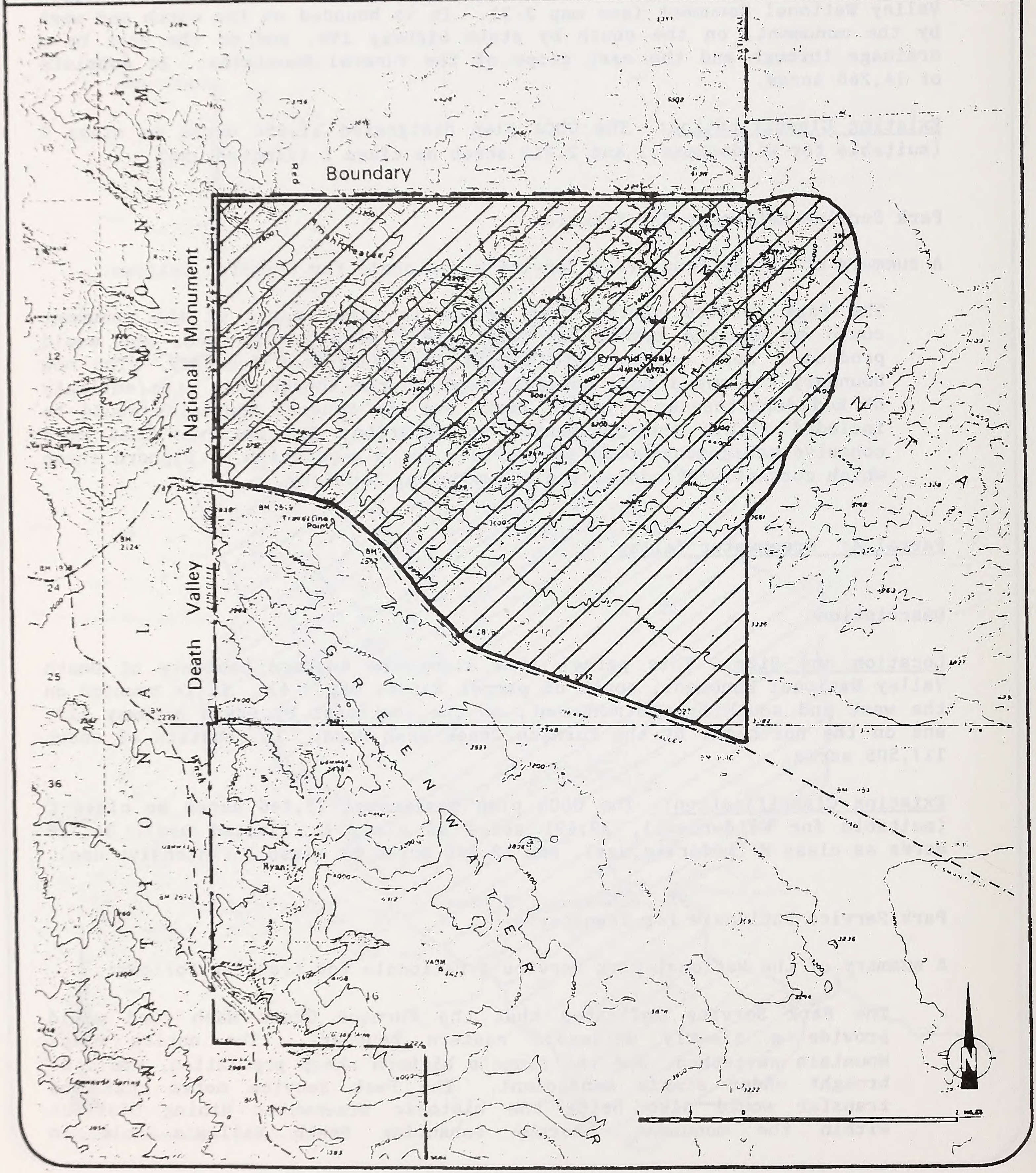
Park Service Rationale for Transfer

A summary of the National Park Service's rationale for transfer follows:

> The Park Service indicates that the Furnace Creek Wash road would provide a clearly definable eastern boundary. The entire Black Mountain watershed, and the range's bighorn sheep population, would be brought under single management. The Park Service notes that the transfer would also bring the historic Greenwater Mining District within the monument, thereby enhancing Death Valley's role in

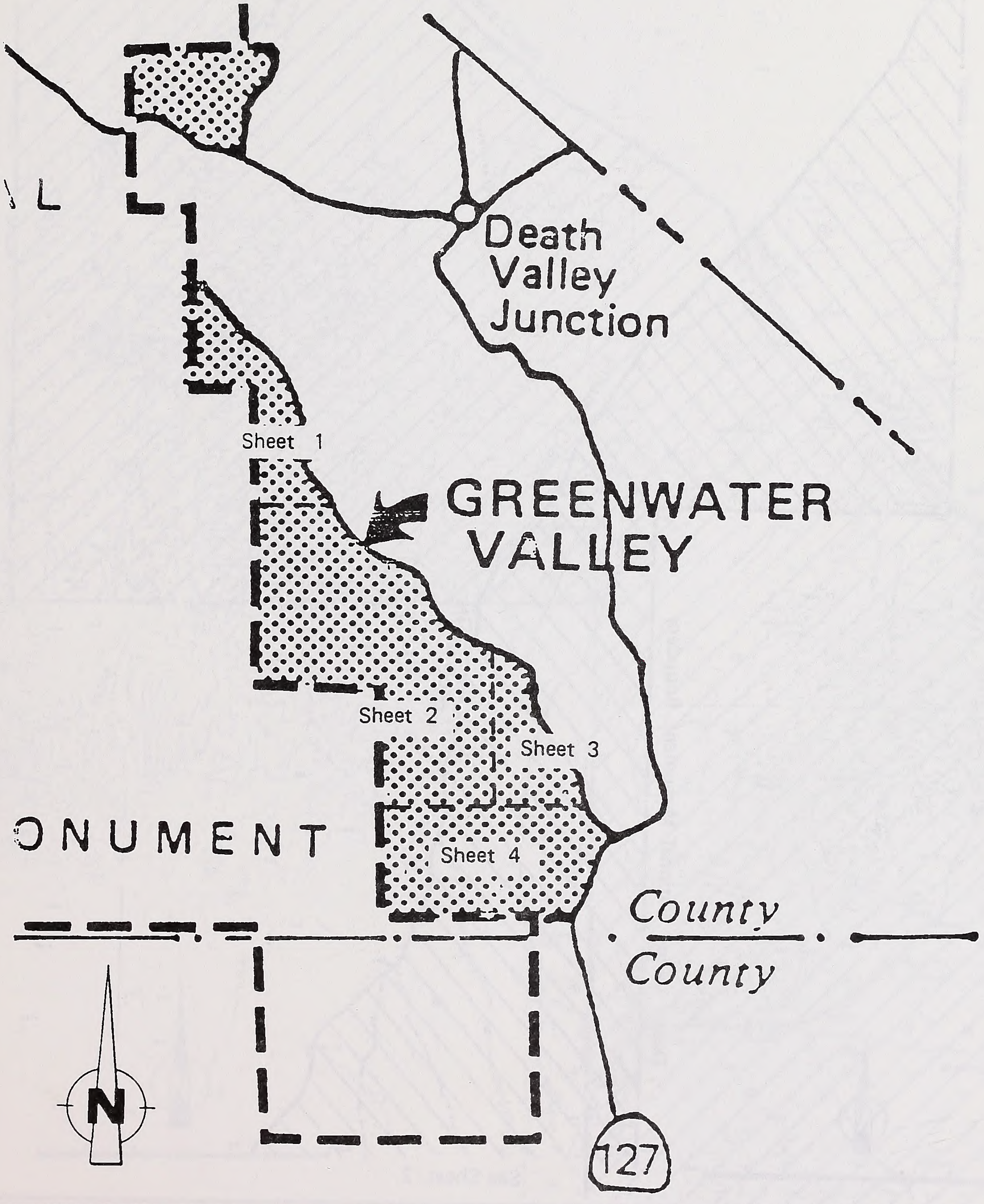
PYRAMID PEAK

MAP 2-3


Boundary
National Monument
Death Valley
Amphitheater
Pyramid Peak
Travertine Point
Ryan
G R E E N W A T E R
N A T I O N A L
M O N U M E N T
N
MILES

Greenwater Valley Index

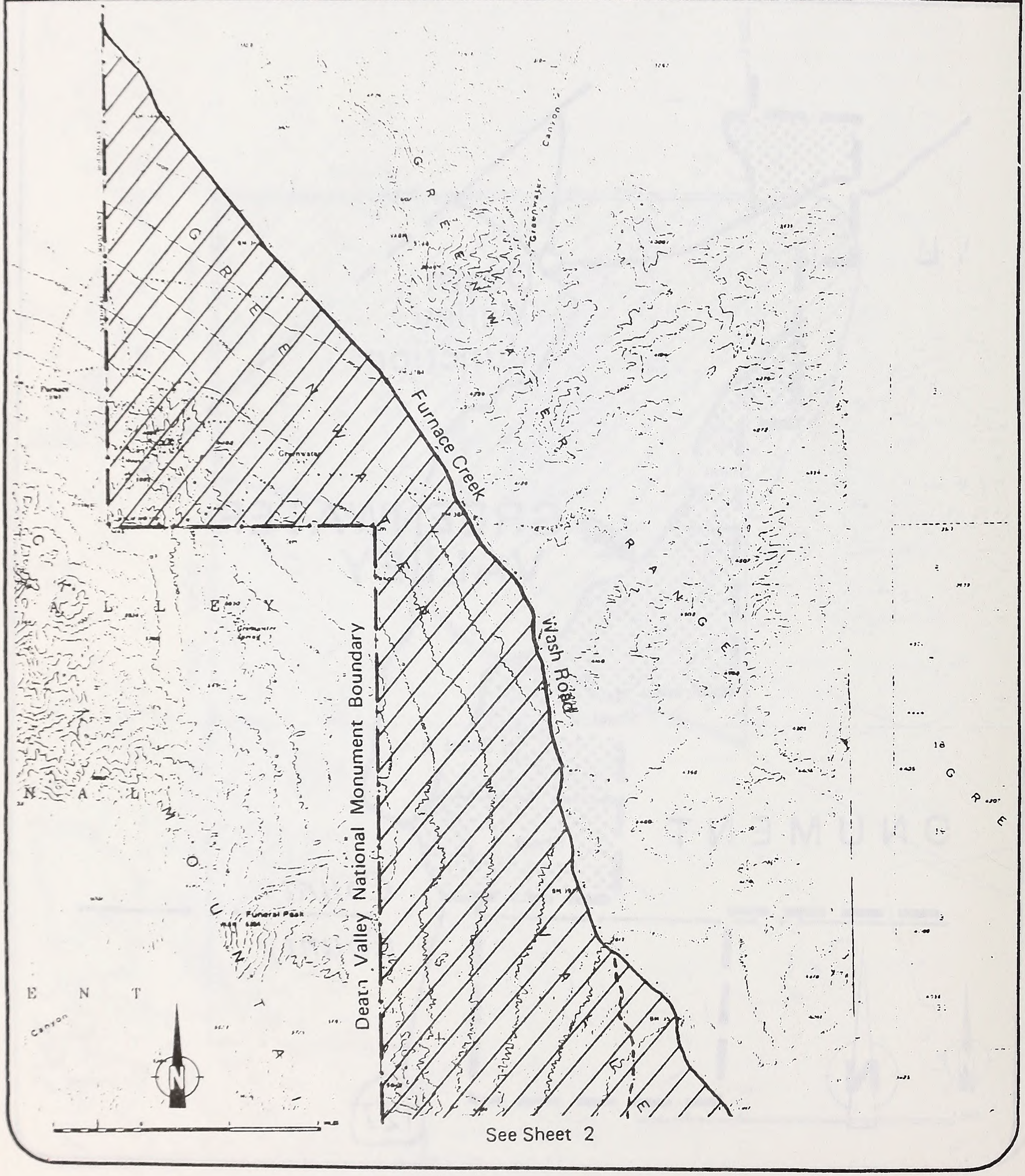
MAP 2-4



Death Valley Junction
GREENWATER VALLEY
Sheet 1
Sheet 2
Sheet 3
Sheet 4
ONUMENT
County
County
N
127

Greenwater Valley

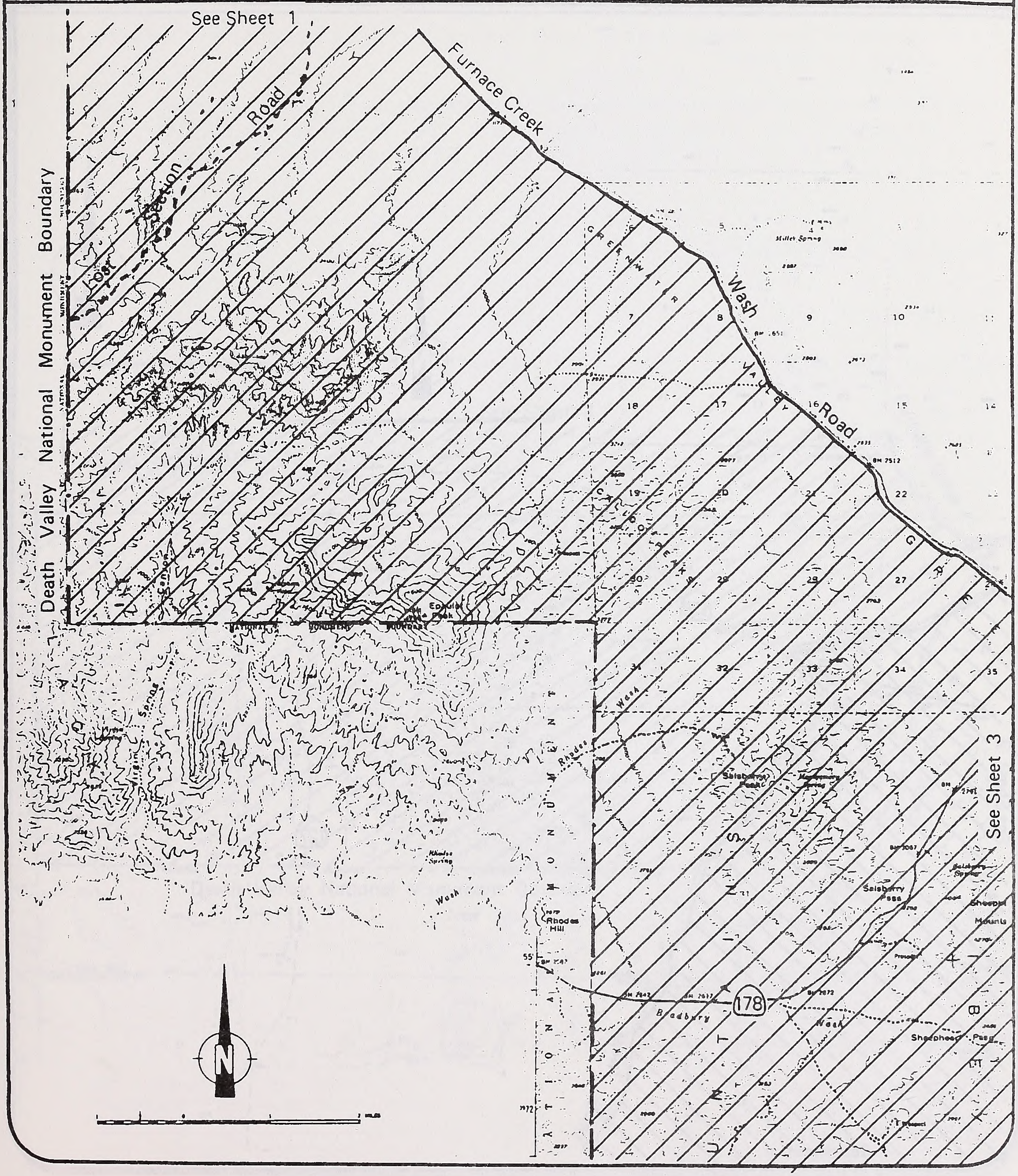
MAP 2-4


G R E E N W A T E R
Greenwater Canyon
Furnace Creek Wash Road
G R E E N W A T E R R A N G E
V A L L E Y
Greenwater
Greenwater Spring
Death Valley National Monument Boundary
Funeral Peak
N A L M O U N T A I N S
E N T
Canyon
N
G R E
See Sheet 2

Sheet 1 of 4

Greenwater Valley

MAP 2-4

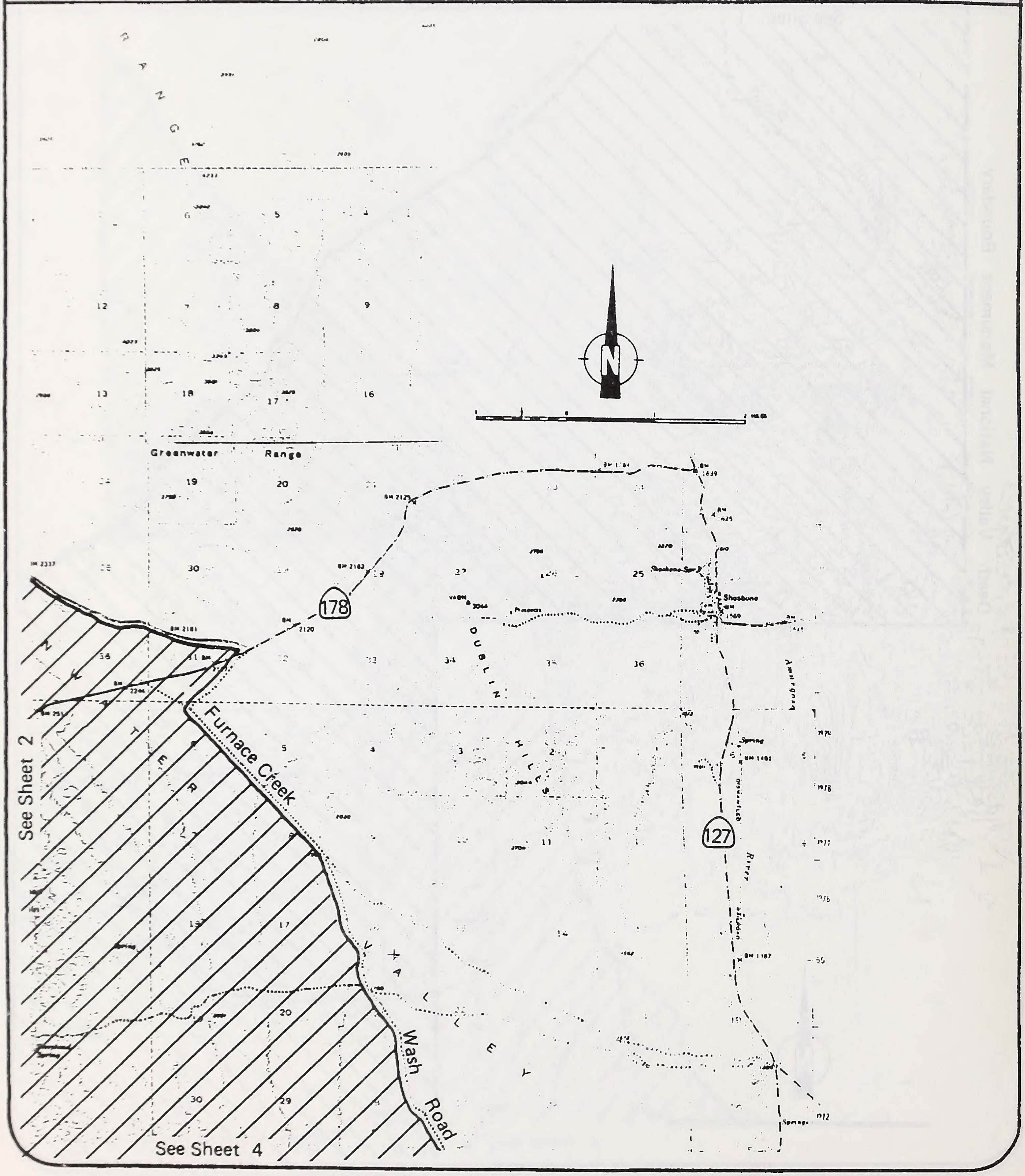


See Sheet 1
Furnace Creek
Greenwater
Wash
Valley
Road
Death Valley National Monument Boundary
Lost Section Road
Canyon
Calico Peaks
National Monument Boundary
Epaulet Peak
Rhodes Wash
Salsberry Peak
Salsberry Pass
Salsberry Spring
Sheephead Pass
Sheephead Mountain
Rhodes Spring
Rhodes Hill
Bradbury Wash
178
National Monument
See Sheet 3
Miller Spring
N

Sheet 2 of 4

Greenwater Valley

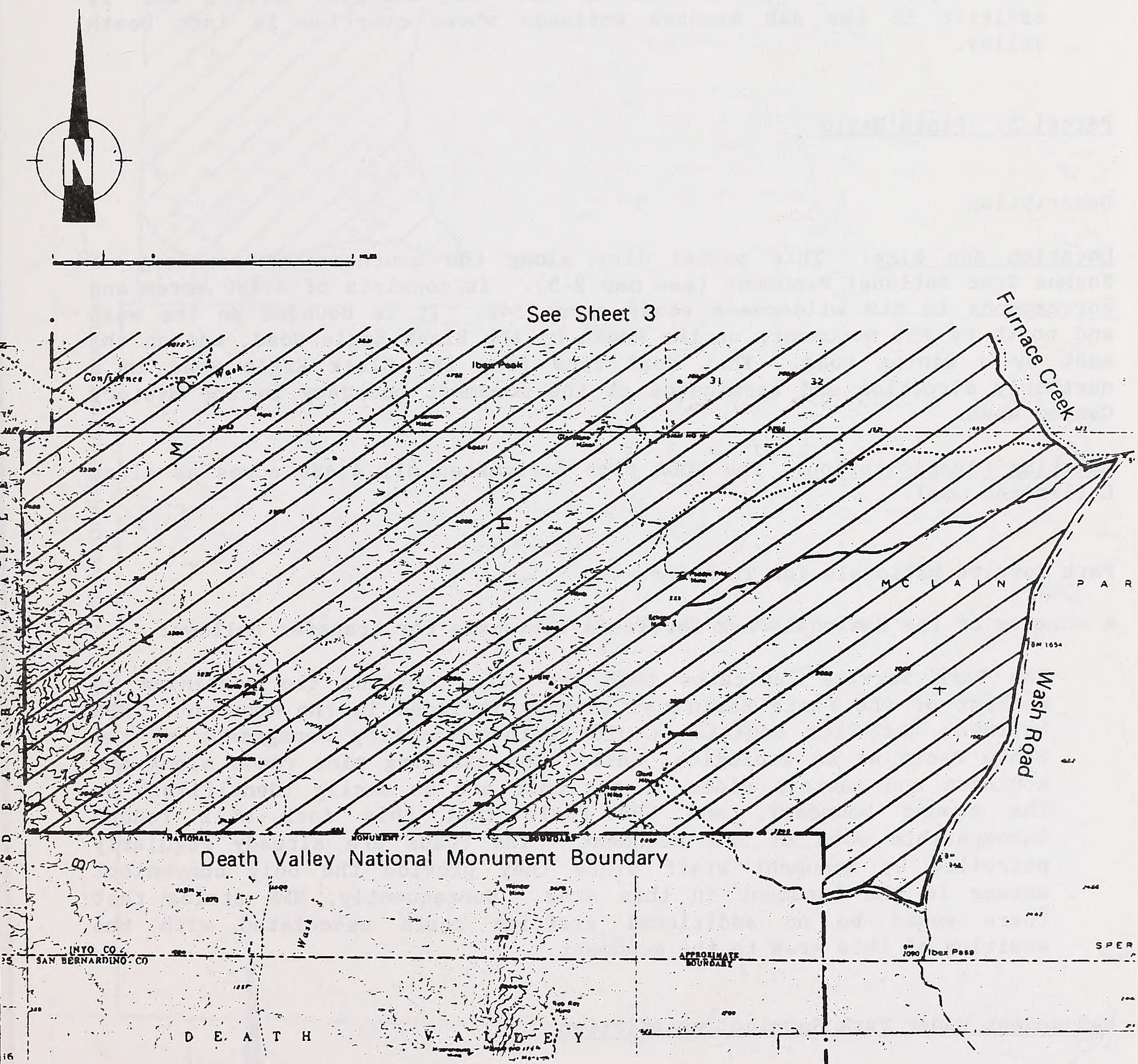
MAP 2-4


RANGE
Greenwater Range
178
Furnace Creek Wash Road
DUBLIN HILLS
Prospects
Shoshone
Amargosa River
127
Spring
Well
Springs
GREENWATER VALLEY
N
See Sheet 2
See Sheet 4

Sheet 3 of 4

Greenwater Valley

MAP 2-4


N
See Sheet 3
Furnace Creek
Confidence
Wash
Ibex Peak
31
32
MCLAIN PAR
BM 1654
Wash Road
Death Valley National Monument Boundary
NATIONAL
MONUMENT
BOUNDARY
INYO CO
SAN BERNARDINO CO
APPROXIMATE BOUNDARY
Ibex Pass
2090
SPER
DEATH VALLEY

Sheet 4 of 4

> representing over a century of mining history of the Northern Mojave Desert.
>
> The Park Service believes that the transfer would afford better protection for Death Valley's water resources. The subsurface flow from this area is vectored directly into Death Valley, and therefore NPS feels that management of this area directly affects water sources within the monument.
>
> The Park Service points out that the parcel's surface runoff is primarily into Greenwater Valley and the Amargosa River, and is additive to the Ash Meadows wetlands whose overflow is into Death Valley.

Parcel 5: Pinto Basin

Description

Location and Size: This parcel lies along the southeastern boundary of Joshua Tree National Monument (see map 2-5). It consists of 4,480 acres and corresponds to BLM wilderness study area 334A. It is bounded on the west and north by the monument, on the south by the Black Eagle Road, and on the east by a mining road. That road runs from the Black Eagle Road in a northerly direction and terminates at the monument boundary in the Mystery Canyon Wash.

Existing Classification: The CDCA plan designated all 4,480 acres as class L (limited use).

Park Service Rationale for Transfer

A summary of the National Park Service's rationale for transfer follows:

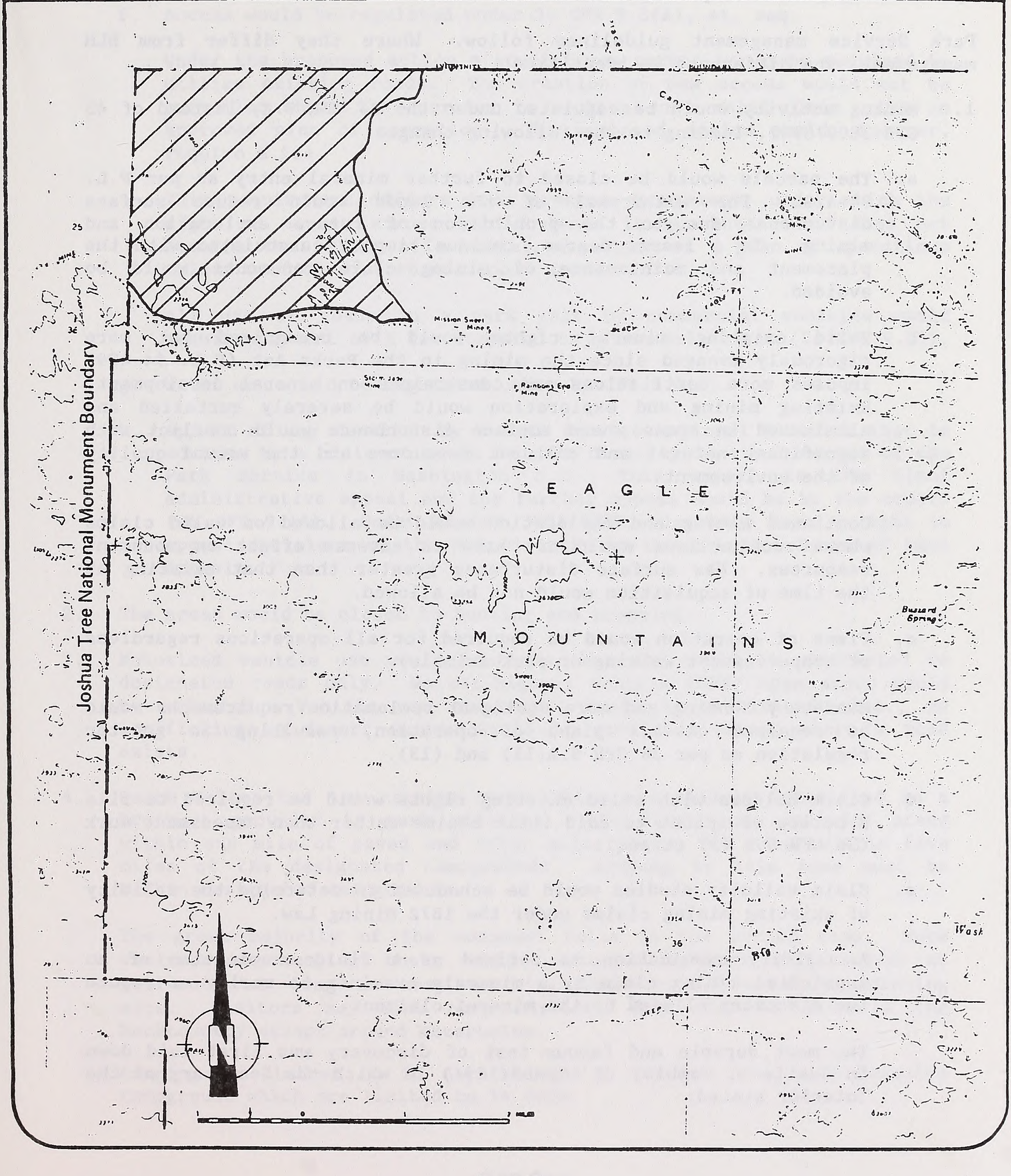
> The Park Service indicates that the area contains the remaining 10 percent of the Pinto Basin not already included in the monument. NPS believes that its addition would further simplify management of the Pinto Basin as an ecological unit. The existing mine roads along the southern and eastern sides of the unit are an easily identifiable on the ground boundary, and NPS feels that this fact will reduce incompatible uses of the monument. The roads are already regularly patrolled by monument staff since they provide the only convenient access to the monument in this area. Consequently, NPS states that there would be no additional staffing costs associated with the addition of this area to the monument.

Management Under Park Service Jurisdiction

The present management of these five parcels is based on a concept of balanced multiple use. This would change under Park Service administration. All activities would be conducted in a manner consistent with the purposes for which the National Park System and each unit thereof was

PINTO BASIN

MAP 2-5


Joshua Tree National Monument Boundary
Canyon
25
Mission Sweet Mine
Rainbows End Mine
E A G L E
M O U N T A I N S
Buzzard Spring
36
Wash
N
MILES

created, as per the National Park Service Organic Act of 1916 and the Redwoods Act of 1978.

Should the parcels be transferred to the National Park Service, uses of the lands could not be authorized if they would degrade the values and purposes for which these areas were transferred, except as shall be directly and specifically provided by Congress.

Park Service management guidelines follow. Where they differ from BLM management, the difference is identified:

1. Mining activity would be regulated under the 36 CFR 9.A, instead of 43 CFR 3809/3802, leading to the following changes:

    a. The parcels would be closed to further mineral entry as per P.L. 94-429. The withdrawal of the lands would reduce surface disturbance due to the prohibition of future exploration and mining. To a lesser degree, residual impacts associated with the placement and maintenance of mining claim monuments would be avoided.

    b. Valid existing mineral rights would be recognized but more rigorously managed since the mining in the Parks Act (P.L. 94-429) imposes more restrictions and constraints on mineral development. Existing mining and exploration would be severely curtailed and eliminated in areas where surface disturbance would conflict with significant natural and cultural resources and the visual quality of the environment.

       Continued mining and exploration would be allowed on valid claims where such actions would not have an adverse effect on monument resources. New surface disturbance greater than that existing at the time of acquisition would not be allowed.

    c. Plans of operation would be required for all operations regardless of scope (except walking or pack animals).

       Mandatory bonding and more stringent reclamation requirements would be required on all plans of operation, resulting in greater regulation as per 36 CFR 9.A(11) and (13).

    d. Claim holders with valid existing rights would be required to file a notice of intent to hold their claims rather than assessment work (36 CFR 9.A (5) et seq).

    e. Claim validity studies would be scheduled to determine the validity of existing mining claims under the 1872 Mining Law.

       A validity examination is defined as a field examination of an unpatented mining claim by a minerals examiner to verify or repute the discovery alleged by the mineral claimant.

       The most durable and famous test of discovery was first laid down in Castle v. Womble, 19 LD 455(1894) in which the Secretary of the Interior stated:

"...where minerals have been found and the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable prospect of success, in developing a valuable mine, the requirements of the (discovery) statutes have been met."

f. Access would be regulated under 36 CFR 9.3(A), et. seq.

Under the proposed action a special use permit would be required to utilize existing roads. The creation of new access would not be curtailed where the operator is working on a valid claim under an approved plan of operation. The proposed action would, however, require a fee.

This requirement differs from present management, under which the right of access across public lands is guaranteed and does not require the filing of a notice of intent or a plan of operations unless surface disturbance would occur.

All use of roads in a park unit by commercial vehicles would require payment of a fee computed on a ton-mile basis (36 CFR 9.15).

g. Water use would be regulated under 36 CFR 9.8(A).

h. Appeal of any decision by a Park Service Regional Director that is adverse to a claimant would be made directly to the Director of the Park Service in Washington D.C. This appeal is the final administrative appeal and any further appeal would be to the courts (36 CFR 9.14). Under 43 CFR 3802/3809, claimants have a right to appeal decisions of the BLM directly to the Interior Board of Land Appeals.

2. The areas would be closed to hunting and trapping.

3. Motorized vehicle use would continue, but use would be restricted to designated roads only. No off-highway vehicle (OHV) open areas would be affected. Vehicle use of "ways" would be prohibited, i.e., no trafficking up desert washes would be permitted except where a road exists.

4. Death Valley has two camping zones which are clearly identified in a brochure provided to park visitors. The first zone includes areas within one mile of paved and other major roads, and areas within five miles of the designated campgrounds. Camping in this zone must be within designated campgrounds.

The great majority of the monument falls in the second zone. Here visitors may camp in their vehicle along designated roads and/or at pull-outs as long as they are $^1/_4$ mile from a wildlife watering site. Visitors may also camp anywhere they wish to walk in the backcountry except around waterholes.

Camping is limited to 30 days except in Furnace Creek and Mesquite Campground which are limited to 14 days.

Within Joshua Tree, backcountry camping is allowed only in areas at least one mile from any designated access road.

5. Fire management would be directed toward restoring fire to its natural role in a dynamic ecosystem. This would be accomplished by allowing certain natural (lightning) starts to burn as prescribed natural fires, while providing for human safety and protection of resources.

6. Where grazing occurs (Hunter Mountain, Northern Death Valley), the current leases will be honored until the current permittee relinquishes the lease or dies. Grazing is not compatible with park purposes and values and would be phased out.

7. Wild Horse and Burro Act constraints do not apply on National Park System (NPS) land. Animals would be subject to removal or direct reduction.

8. Designated wilderness areas would be managed under NPS wilderness management guidelines. These guidelines are very similar to the BLM's guidelines, except that certain recreation activities would not be allowed. This would restrict hunting, trapping, rockhounding, and other activities that would be allowed in BLM wilderness areas.

9. Cultural resources and the management of same would not be affected.

10. Consumptive uses such as firewood collecting and rock collecting would not be allowed. Collection for scientific purposes and all research would be by permit only.

11. Natural areas would be managed to maintain natural ecosystems and processes. Any existing wildlife guzzlers will be maintained since wildlife may have become dependent upon them. However, should these artificial watering sources be destroyed by natural catastrophic events, they would not be replaced. No new guzzlers would be constructed unless research shows that man's development activities have precluded the use of natural sources by wildlife, or unless conditions present at the time of construction are still in effect (i.e. guzzlers used at natural spring sites altered by human activities).

MODIFIED ALTERNATIVE A:
BLM/NPS PREFERRED

Parcel 1: North Death Valley

It is the same as Parcel 1 of the Alternative A: Proposed Action. By mitigation, there was an adjustment to the boundary in the northwest corner of the proposal to eliminate a mineralized area. There is an added mitigation resulting from an issue which applies generically to all boundary extensions and is specific to this area. West of Sand Springs is a bighorn sheep guzzler, a large water storage facility cooperatively installed by California Department of Fish and Game, volunteers of the Society for the Conservation of Bighorn Sheep and the BLM. NPS will maintain the existing facilities within the expansion area or allow volunteer maintenance by others, unless it is conclusively demonstrated that the facility is no longer needed to maintain the sheep population.

Parcel 2: Hunter Mountain

Hunter Mountain will be retained by the BLM. It is not an integral part of Death Valley. Public reaction, plus a variety of resource values and uses, indicate that multiple use management within the CDCA is most appropriate. This will allow continuation of grazing, hunting use, recreational access and opportunity to develop mineral resources. It is recognized that the addition of two new rangers at Big Pine provides a greater degree of patrol and use supervision in the area.

It is understood that a way be found to eliminate cattle trespass into DVNM and minimize the potential for disease transmitted to the native bighorn sheep population. There is also a need to eliminate hunter incursion into DVNM which results in poaching and illegal hunting. Fire management policy must be coordinated, and a fire management plan developed. A burn in the past four years has resulted in cattle use expanding and spreading into DVNM; however, moving the DVNM boundary to the Grapevine Canyon road would not solve any of these issues. Environmental impact is negligible, because 89% of Hunter Mountain is Class C (recommended for wilderness) and interim wilderness management. Further, as outlined in the Memorandum for the Record between the Park Service and Bureau of Land Management in Appendix G, a cooperative agreement will be completed in 1989 to more effectively deal with these issues.

Parcel 3: Modified Pyramid Peak

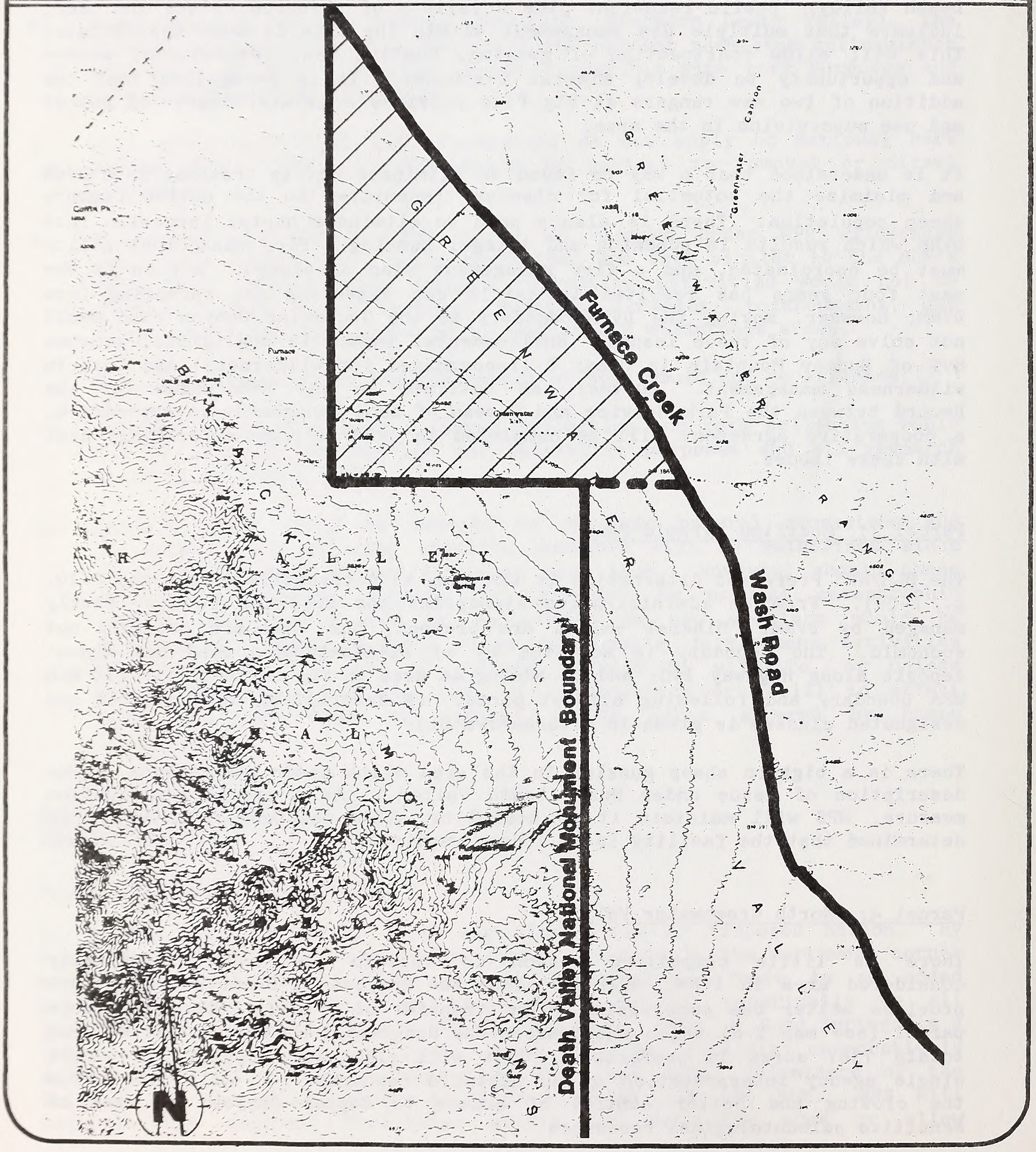
The BLM/NPS Preferred Alternative is the same as Alternative D (see map 2-10, p. 2-29). From an administrative standpoint the area can be most easily managed by DVNM. Mineral values are present, but they are probably not economic. The boundary is adjusted by a) eliminating a sand and gravel deposit along Highway 190; and b) adding an area in the northeast to fit BLM WSA boundary and following aliquot parts. (A description of the acres and designated classes is given in Alternative D.)

There is a bighorn sheep guzzler in the area which needs maintenance. (See description of issue under North Death Valley.) As a specific mitigation measure, NPS will maintain it as needed or allow maintenance until it is determined that the facility is no longer required.

Parcel 4: North Greenwater Valley

There is little compelling reason to include the entire, initially considered area in DVNM. BLM has added two rangers at Shoshone, which now provides better use supervision. The transfer of a small triangular shape parcel (see map 2-6) which encompasses the Greenwater Historic District, and totals 7387 acres is preferable. This will eliminate a split and permit single agency interpretation of an historic resource. It will also allow the closing and better control of access to Copper Canyon, an area of sensitive paleontological resources.

North Greenwater Valley MAP 2-6


Furnace Creek Wash Road
Death Valley National Monument Boundary
G R E E N W A T E R
G R E E N W A T E R   R A N G E
Greenwater Canyon
Greenwater
Furnace
Coffin Pk
V A L L E Y
N

The NPS proposal to move the boundary to the Furnace Creek Wash Road and provide a more recognizable boundary has been outweighed by administrative considerations associated with bringing NPS administration into an entirely new valley. Further, there are clearly numerous mining properties and roads throughout the area, and little compelling reason to remove the area from the CDCA and multiple use management. It is closely regulated, since most of the area is designated class C or L by the Desert Plan.

Parcel 5: Modified Pinto Basin

The small rectangular area adjacent to Joshua Tree National Monument, WSA 334A, is appropriate and logical for inclusion in the Monument. The larger Eagle Mountain area looked at in the DEIS is inappropriate because of roading and extensive mining and undeveloped mineralization.

A small change was made to move the east boundary eastward about one-fourth mile (see map 2-7) and include all of the wash in the Monument. This will provide vehicular closure to the wilderness and provide more enforceable boundary since vehicles will not be able to skirt the Monument boundary in the wash.

ALTERNATIVE B:
MODIFIED GREENWATER VALLEY PARCEL

That portion of the Greenwater Valley Parcel north and west of the crest of the Ibex Hills would be transferred to Death Valley National Monument, a total of 87,174 acres (see map 2-8). The area to be transferred would include 23,440 acres presently designated as class C (recommended wilderness) by the CDCA Plan, 39,691 acres of class L (limited use), 18,091 acres of class M (moderate use), and 5,952 acres of class I (intensive use).

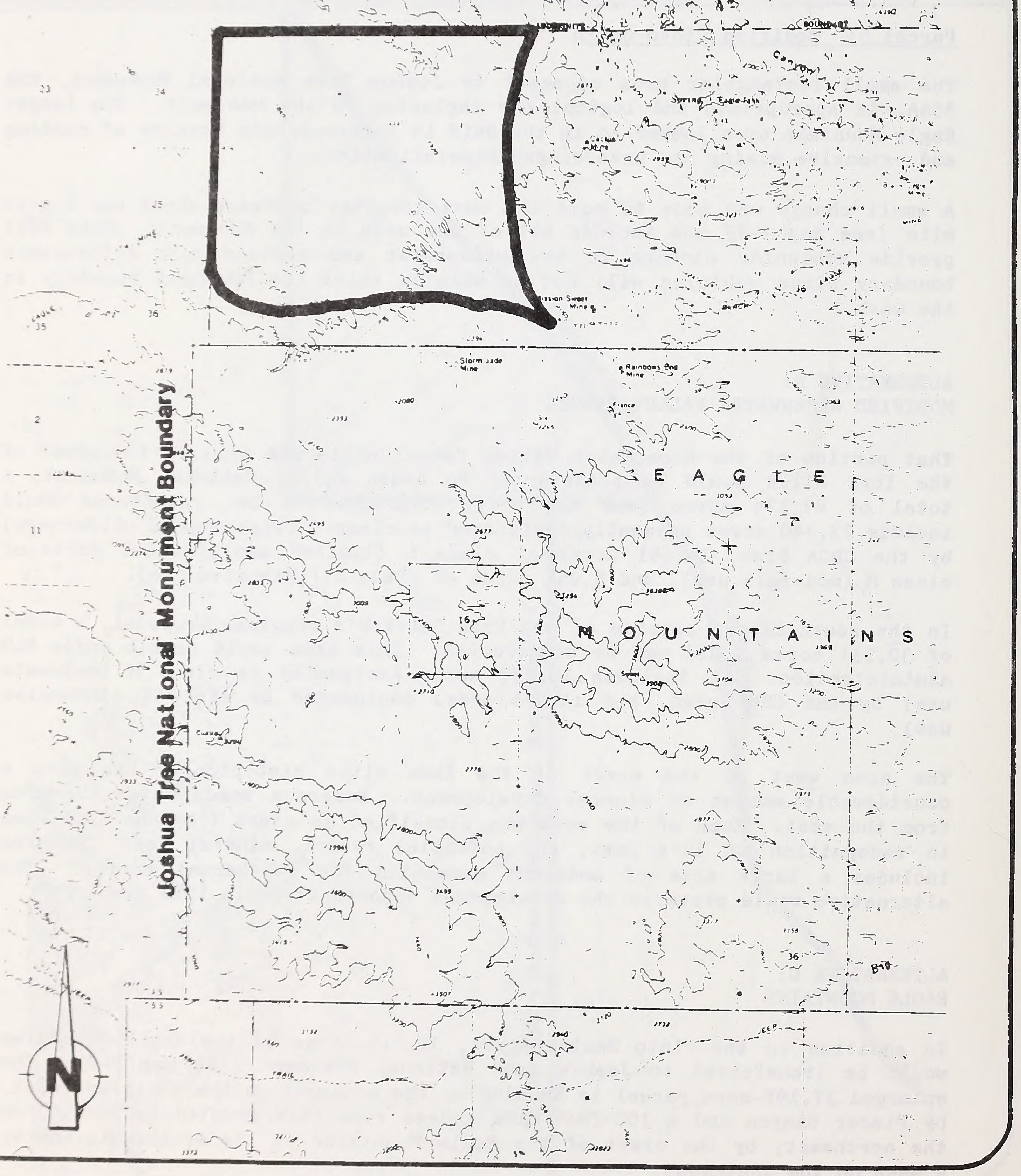
In the southeastern portion of the Park Service's original proposal, a total of 30,331 acres would not be transferred. This area would remain under BLM administration. It includes 16,637 acres designated as class M (moderate use) by the CDCA plan, and 13,694 acres designated as class I (intensive use).

The area west of the crest of the Ibex Hills historically has seen a considerable amount of mineral development. Numerous roads enter the area from the east. Much of the area was classified as class I by the CDCA Plan in recognition of it's past, and potential future, mineral use. It also includes a large area of moderate potential for geothermal energy. The alternative would preserve the development opportunities in this area.

ALTERNATIVE C:
EAGLE MOUNTAINS

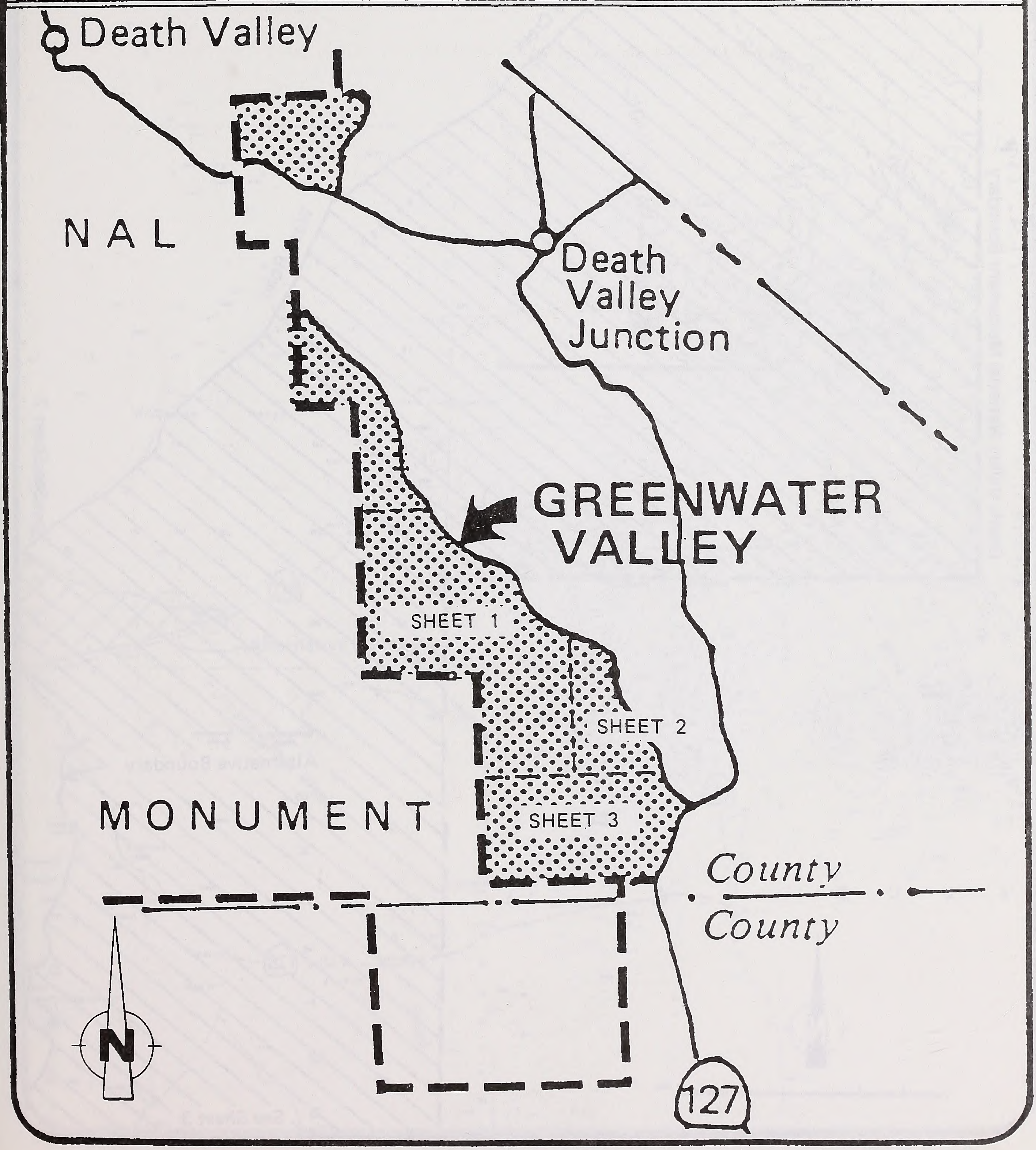
In addition to the Pinto Basin parcel, 32,715 acres of the Eagle Mountains would be transferred to Joshua Tree National Monument (see map 2-9). The enlarged 37,195-acre parcel is bounded by the monument on the north and west, by Placer Canyon and a 100-foot-wide access road (R/W granted by R04896) on the northeast, by the crest of the Eagle Mountains on the southeast, and by a wash on the southwest.

Modified Pinto Basin MAP 2-7


Joshua Tree National Monument Boundary
E A G L E
M O U N T A I N S
Storm Jade Mine
Rainbows End Mine
Mission Sweet Mine
Spring
Eagle Tank
Canyon
BOUNDARY
MINE
EAGLE
JEEP
TRAIL
N
23
34
35
36
2
11
16
36

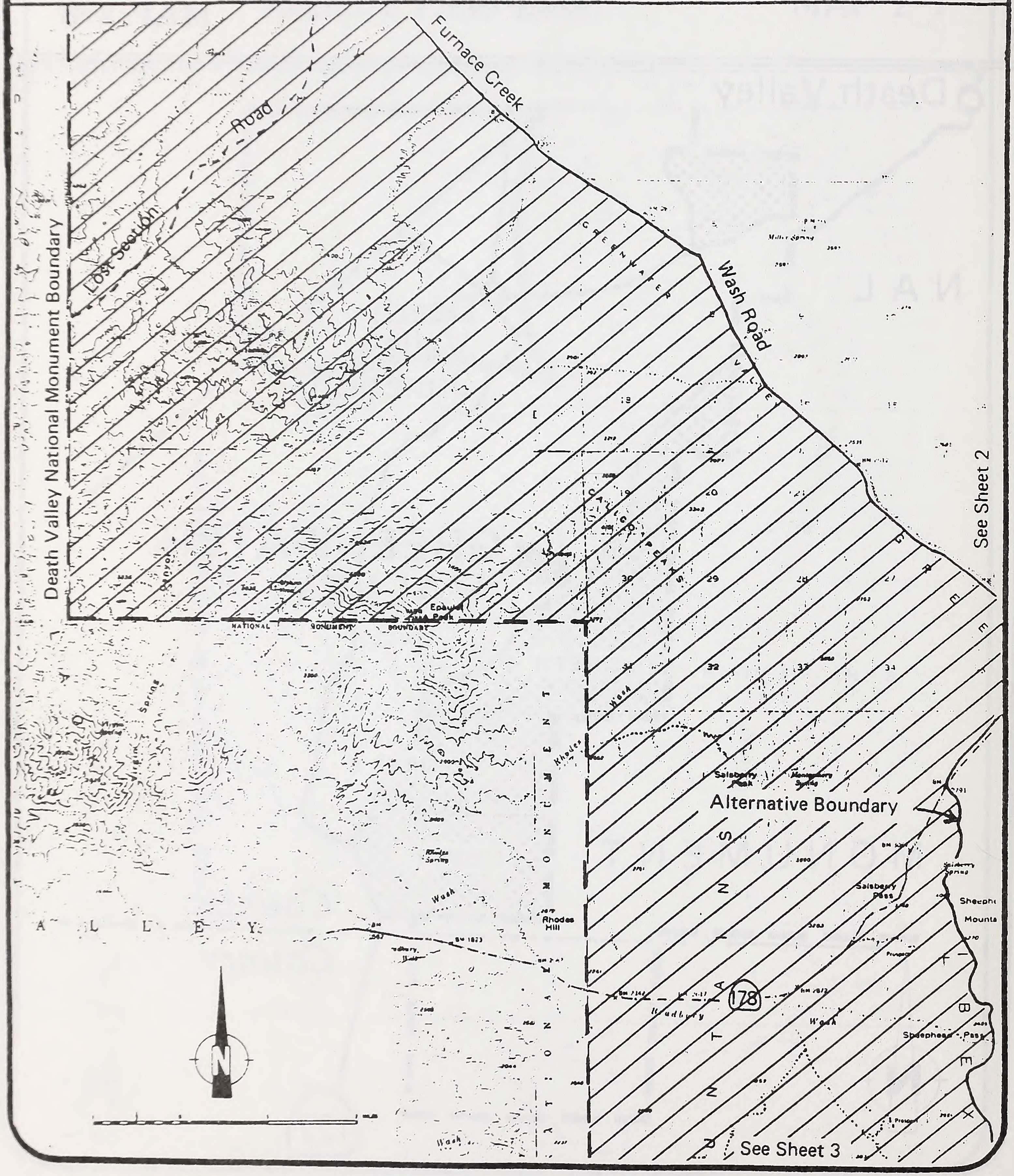
Greenwater Valley Alternative
INDEX

MAP 2-8


Death Valley
NAL
Death Valley Junction
GREENWATER VALLEY
SHEET 1
SHEET 2
SHEET 3
MONUMENT
County
County
N
127

Greenwater Valley Alternative

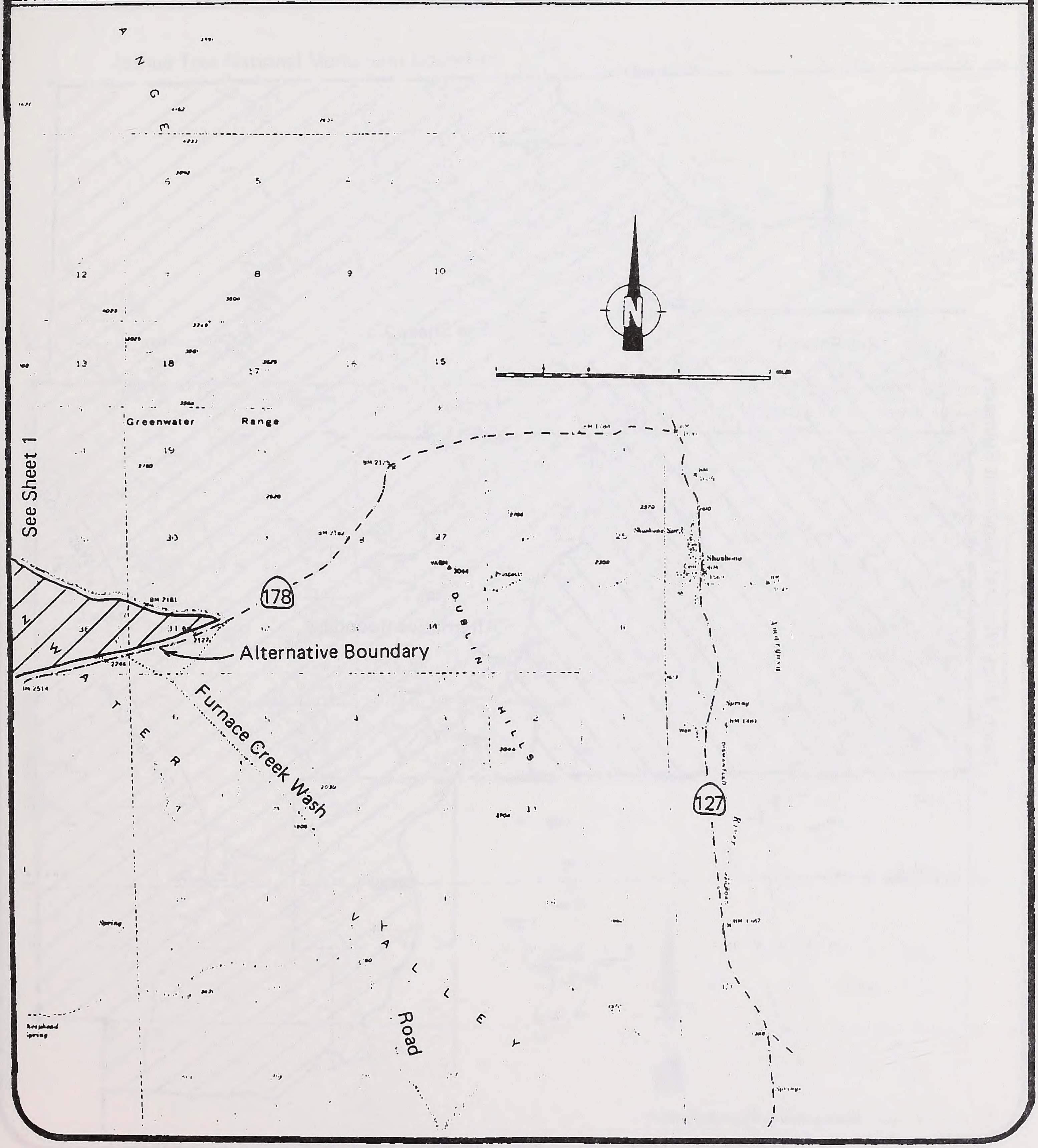
MAP 2-8


Furnace Creek
Wash Road
Road
Lost Section
Death Valley National Monument Boundary
National Monument Boundary
Epaulet Peak
Greenwater Valley
Salsberry Peak
Monolith Spring
Alternative Boundary
Salsberry Spring
Salsberry Pass
Sheephead Mountain
Sheephead Pass
Rhodes Hill
Rhodes Spring
Rhodes Wash
Virgin Spring
178
Valley
National Monument
Greenwater Range
See Sheet 2
See Sheet 3

Sheet 1 of 3

Greenwater Valley Alternative

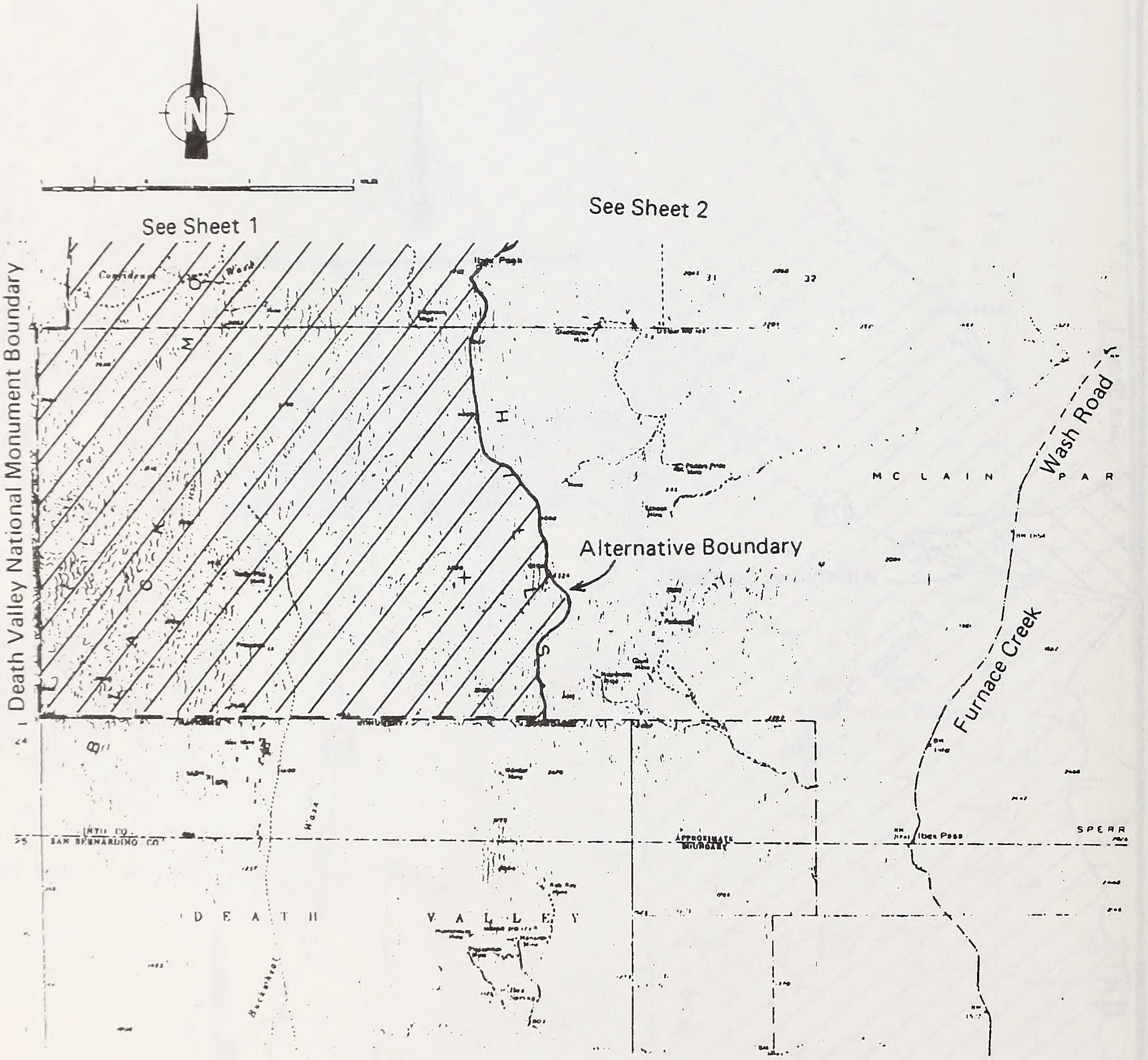
MAP 2-8


See Sheet 1
Greenwater Range
178
Alternative Boundary
Furnace Creek Wash
DUBLIN HILLS
Shoshone
127
Amargosa River
VALLEY
Road
Spring
N

Sheet 2 of 3

Greenwater Valley Alternative

MAP 2-8

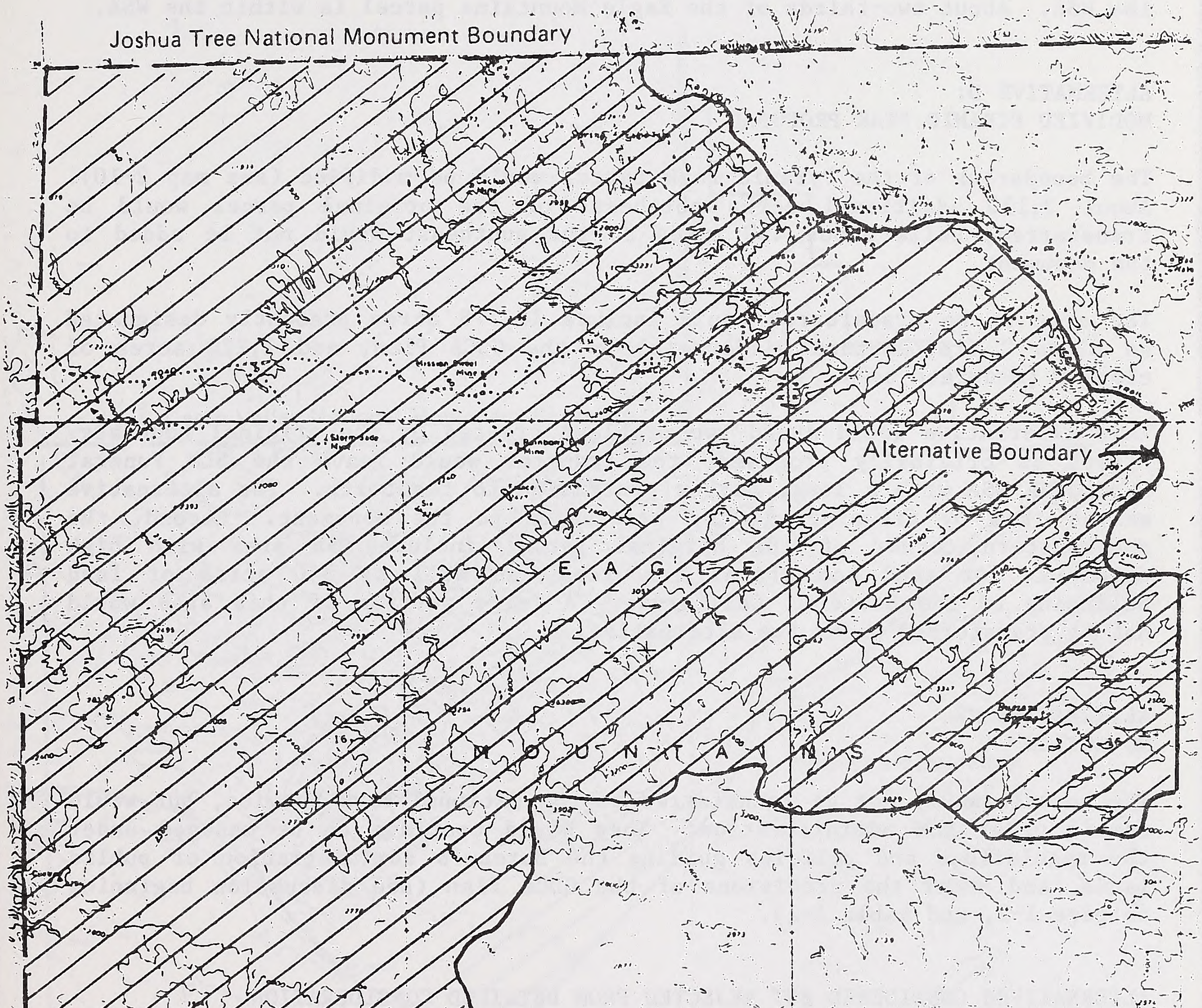


N
See Sheet 1
See Sheet 2
Death Valley National Monument Boundary
Alternative Boundary
Wash Road
Furnace Creek
M C L A I N
P A R
D E A T H
V A L L E Y
Ibex Pass
SPERR
APPROXIMATE BOUNDARY
INYO CO.
SAN BERNARDINO CO.

SHEET 3 of 3

Eagle Mountains Alternative

MAP 2-9


Joshua Tree National Monument Boundary
Alternative Boundary
E A G L E
M O U N T A I N S
Mission Sweet Mine
Black Eagle Mine
Buzzard Spring
N

The area to be transferred would include 19,906 acres presently designated as class C (recommended wilderness) by the CDCA Plan, 4,865 acres of class L (limited use), 3,241 acres of class M (moderate use), and 9,183 acres of class I (intensive use).

The Eagle Mountains wilderness study area (WSA) lies immediately south and west of the Pinto Basin parcel. A large portion of the WSA is recommended for designation as wilderness and this, together with its proximity to the monument, led to the study of a larger parcel which included a portion of the WSA. About two-thirds of the Eagle Mountains parcel is within the WSA.

ALTERNATIVE D:
MODIFIED PYRAMID PEAK PROPOSAL

The boundaries of the Pyramid Peak parcel would be modified (see map 2-10). About 3,180 additional acres northeast of the original parcel would be transferred, while about 450 acres to the southeast would not be added to the monument.

The area to be transferred would include 15,778 acres presently designated as class C (recommended wilderness) by the CDCA Plan, and 1,220 acres of class M (moderate use).

This alternative would avoid two problems created by the original boundary. First, as originally proposed, the transfer would leave the BLM Funeral Mountains WSA with a long, narrow protrusion to the north. The alternative solves this by transferring the protrusion to the monument. Second, the southeastern corner of the original parcel includes an area with high potential for sand and gravel resources, as well as 640 acres of land belonging to the State of California. A large portion of this area would not be transferred under the alternative.

ALTERNATIVE E:
NO ACTION

The parcels would not be transferred to the National Park Service, but would remain under BLM administration. They would continue to be managed under the regulations and policies guiding the Bureau's administration of public lands, and under the provisions of the CDCA Plan (see discussion beginning on page 1-2, and table 1-1).

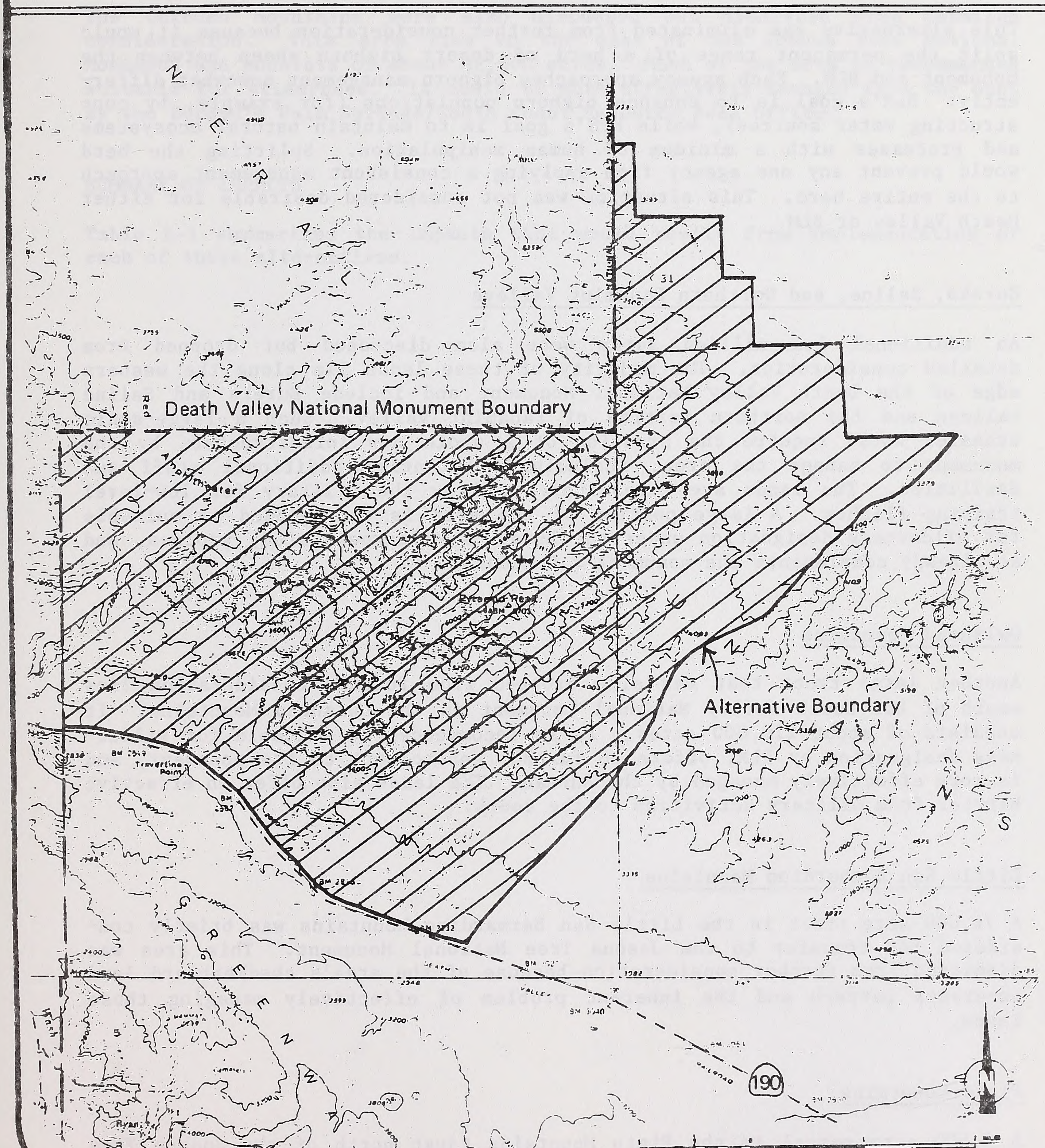
ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED CONSIDERATION

The following alternatives were analyzed by the BLM and the National Park Service. It was decided not to consider them in detail for the reasons stated below.

Funeral Mountains

A second Modified Pyramid Peak alternative was briefly considered but eliminated from detailed consideration. This proposal would have redrawn the

Pyramid Peak Alternative MAP 2-10


Death Valley National Monument Boundary
Alternative Boundary
Pyramid Peak
Amphitheater
Red
Travertine Point
BM 2519
BM 2916
BM 3040
190
Ryan
N

National Monument-BLM boundary along the crest of the Funeral Mountains. The east front of the mountains (15,000 acres) would have been transferred from the National Monument to BLM. The portion of the west front not already within the National Monument (7,000 acres) would have been transferred from BLM to the National Monument.

This alternative was eliminated from further consideration because it would split the permanent range of a herd of desert bighorn sheep between the Monument and BLM. Each agency approaches bighorn management somewhat differently: BLM's goal is to enhance bighorn populations (for example, by constructing water sources), while NPS's goal is to maintain natural ecosystems and processes with a minimum of human manipulation. Splitting the herd would prevent any one agency from applying a consistent management approach to the entire herd. This situation was not considered desirable for either Death Valley or BLM.

Eureka, Saline, and Northern Panamint Valleys

An additional 1.1 million acres were also discussed but dropped from detailed consideration. The majority of these lands lie along the western edge of the Death Valley National Monument and include Eureka and Saline valleys and the northern portion of Panamint valley. Such a large-scale transfer would require the creation of a whole new infrastructure by the monument to manage the area, including substantial additional staff and facilities. The lands are extensively used by the military for low-level training flights. A large portion of the area is recommended as suitable for wilderness designation under the Bureau's wilderness study process, and so already complements the monument's boundary.

Owlshead Mountains

Another large tract that was also dropped from further consideration lies south of the Death Valley National Monument in the Owlshead Mountains. It consists of about 210,000 acres. It is recommended as suitable for wilderness designation by BLM, offers no further enhancement to the monument, and is more effectively managed by the Bureau. The lands also offer an effective barrier from military activities to the south.

Little San Bernardino Mountains

A 76,000 acre tract in the Little San Bernardino Mountains was briefly considered for transfer to the Joshua Tree National Monument. This area was dismissed from further consideration because of the area's checkerboard land ownership pattern and the inherent problem of effectively managing these lands.

Pinto Mountains

A 7,500 acre parcel in the Pinto Mountains (just north of the Joshua Tree National Monument) was also briefly considered. It was dismissed because of the large number of mining claims in the area and the potential mineral development conflicts these claims portend.

Coxcomb Mountains

The Coxcomb Mountains were also discussed but dismissed from detailed consideration. This area lies to the east of the Joshua Tree National Monument and consists of about 82,500 acres. Much of the area is recommended suitable for wilderness. It could be more effectively managed from the east by the Bureau's Palm Springs/South Coast Resource Area Office.

SUMMARY OF IMPACTS

Table 2-1 summarizes the impacts that would result from implementation of each of these alternatives.

Table 2-1
Summary of Impacts[1]

Resource	Alternative A by Parcel[2] (Proposed Action)					Alternative			Alternative E by Parcel (No Action Alt.)					Modified Alternative A[3] (Preferred Alt.)				
	1	2	3	4	5	B	C	D	1	2	3	4	5	1	2	3	4	5
Wildlife	0	+	0	-	+	-	+	0	-	-	+	+	0	0	-	+	+	+
Botany	+	0	+	+	+	+	+	+	+	0	0	0	+	+	0	+	0	+
Grazing	-	-	0	0	0	0	0	0	0	+	0	0	0	-	+	0	0	0
WH&B	0	-	-	0	0	0	0	-	0	0	0	0	0	0	0	-	0	0
Cult Res	+	+	+	+	+	+	+	+	0	0	0	0	0	+	0	+	0	+
Lands	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Airspace	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Recreation																		
Primitive	+	+	0	0	+	0	+	0	0	0	0	0	+	+	0	0	0	+
Vehicular	0	-	-	0	0	0	--	-	0	0	-	0	0	0	0	-	0	0
Hunting	-	-	0	0	0	0	-	0	0	0	0	0	0	-	0	0	0	0
Harvest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Wilderness	0	0	0	+	+	+	+	0	0	0	0	-	-	0	0	0	-	+
GEM																		
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Minerals	-	--	-	--	0	-	--	-	0	0	0	0	0	-	0	-	0	0

[1]
++ Highly positive impact
+ Slightly positive impact
0 Neutral impact
- Slightly negative impact
-- Strongly negative impact

[2]
1 North Death Valley
2 Hunter Mountain
3 Pyramid Peak
4 Greenwater Valley
5 Pinto Basin

[3]
1 North Death Valley
2 Hunter Mountain
3 Modified Pyramid Peak
4 North Greenwater Valley
5 Modified Pinto Basin

CHAPTER 3

AFFECTED ENVIRONMENT

CHAPTER III

AFFECTED ENVIRONMENT

INTRODUCTION

The affected environment refers to the area which may be affected by the transfer of the five parcels to the National Park Service, and by the subsequent imposition of management considerably different from that prescribed by BLM. In most cases, the area affected is limited to the boundaries of the transfer parcels.

PARCEL ONE: NORTH DEATH VALLEY

Wildlife

Wildlife habitat consists of northern Mojave Desert scrub and woodland in the extreme northern portion of Death Valley and two adjacent, rugged mountainous areas, the Last Chance Range and Greenwater Range. Desert scrub habitat is characterized by vegetation that includes creosotebush (Larrea tridentata), bursage (Ambrosia dumosa), joint-fir (Ephedra sp.), buckwheat (Eriogonum fasciculatum), spiny hop-sage (Grayia spinosa), desert holly (Atriplex hymenelytra), and others. Woodland habitats include big sagebrush (Artemisia tridentata), Joshua tree (Yucca brevifolia), single-leaf pinyon pine (Pinus monophylla), and others.

Common vertebrates occurring in the parcel include the chuckwalla (Sauromalus obesus), side-blotched lizard (Uta stansburiana), zebra-tailed lizard (Callisaurs draconoides), sidewinder (Crotalus cerastes), red-tailed hawk (Buteo jamaicensis), golden eagle (Aquila chrysaetos), mourning dove (Zenaida macroura), horned lark (Eremophila alpestris), common raven (Corvus corax), loggerhead shrike (lanius ludovicianus), sage sparrow (Amphispiza belli), Merriam's kangaroo rat (Dipodomys merriami), deer mouse (Peromyscus maniculatus), desert woodrat (Neotoma lepida), white-tailed antelope squirrel (Ammospermophilus leucurus), black-tailed jackrabbit (Lepus californicus), and the kit fox (Vulpes macrotis).

The Death Valley ecosystem is the entire geographic/hydrographic unit, extending from the existing monument boundary north to the natural boundary formed by the Last Chance and Greenwater Ranges. Ecosystems generally are defined according to natural features as opposed to political or artificial boundaries.

Unique Habitats

Sand Spring and Little Sand Spring provide the only permanent, natural water in the parcel. Both springs occur in the valley, and each supports limited but important aquatic and riparian habitats that are essential to the occurrence of many species of animals and plants. Screwbean mesquite (Prosopis pubescens) is associated with both springs. Actually, each of these two springs is comprised of a series of individual seeps along a fault and adjacent uplifted bluff or hill. Riparian vegetation includes cattail (Typha latifolia), common reed (Phragmites communis), saltgrass (Distichlis spicata), rush (Juncus sp.), stream orchis (Epipactis gigantea), yerba mansa (Anemopsis californica), and others.

Significant Species

Two sensitive animals, the golden eagle (Aquila chrysaetos) and desert bighorn (Ovis canadensis nelsoni) occur within the parcel.

Golden Eagle: A majority of the Last Chance Range is believed to be used as foraging territory for the golden eagle, in addition to another raptor, the prairie falcon (Falco mexicanus) (Bureau of Land Management 1980). It is highly likely, due to the nature of the terrain in this area, that several nesting sites or aeries for the golden eagle and prairie falcon occur in the parcel.

Desert Bighorn: Desert bighorn occur within a portion of the Last Chance Range in the parcel. However, they occupy most of the Last Chance Range and a majority of the population occurs outside the parcel and outside the boundary of Death Valley National Monument (Bureau of Land Management 1980, Weaver and Mensch 1970).

Desert bighorn are considered especially important and therefore greater detail of their status in the parcel is appropriate. In addition to their occurrence throughout the Last Chance Range, they occupy adjacent ranges, including Hunter Mountain, Cottonwood Mountains, and the Saline Range. Bighorn, primarily rams, are known to move throughout these mountain ranges through "corridors".

The desert bighorn population in the Last Chance Range is greater on the western slope (outside of the transfer parcel) due to more extensive habitat and the existence of two guzzlers (a device for collecting, storing and dispensing water). These two guzzlers have been in place for about 10 years and were installed by the California Department of Fish and Game and Bureau of Land Management. A third guzzler was constructed on the east slope of the range approximately three miles west of Sand Spring in the fall of 1987 by the Department of Fish and Game, the Society for the Conservation of Bighorn Sheep and the Bureau of Land Management. If successful in providing water, this habitat enhancement project may result in an increase in the bighorn population within the parcel. A bighorn concentration area was identified by Weaver (1970) on and adjacent to Last Chance Mountain located immediately north of the parcel. Bighorn are believed to move freely throughout the Last Chance Range (Weaver and Mensch 1970). McLean (1951) observed several bighorn approximately 200 yards northwest of Sand Spring during a field inspection of the area from June 23-30, 1951. There have been no reports of bighorn using Sand Spring for a water supply in recent years.

The bighorn population in the range has apparently increased since surveys were initiated, from 35 in 1957 and 85 in 1982 to 100 in 1988 (Weaver 1982, Bureau of Land Management 1988). This increase may be attributed to the installation of the two guzzlers in the mid 1970's. The management goal for bighorn population in the range is 150 animals (Bureau of Land Management 1988).

Area of Critical Environmental Concern (ACEC):

The Bureau of Land Management established an ACEC at Sand Spring and Little Sand Spring in 1983 (Map 3-1) (Bureau of Land Management 1983). Wildlife habitat associated with the aquatic and riparian habitats is the key component of the ACEC, and is particularly attractive to migratory and resident birds.

Botany

The springs and seeps at and near Big and Little Sand Springs in north Death Valley support an Unusual Plant Assemblage (UPA) and a rare plant population. UPAs associated with major springs and seeps are considered highly sensitive to disturbance according to Appendix X of the Proposed California Desert Conservation Area (CDCA) Plan, October 1980. In accordance with the CDCA Plan of 1980, highly sensitive UPAs will be treated in a manner which preserves the habitat and ensures the continued existence of the plant assemblage. As a UPA with a rare plant population, Big and Little Sand Springs is managed according to the BLM Sensitive Plant Policy and has been given additional protection with ACEC designation.

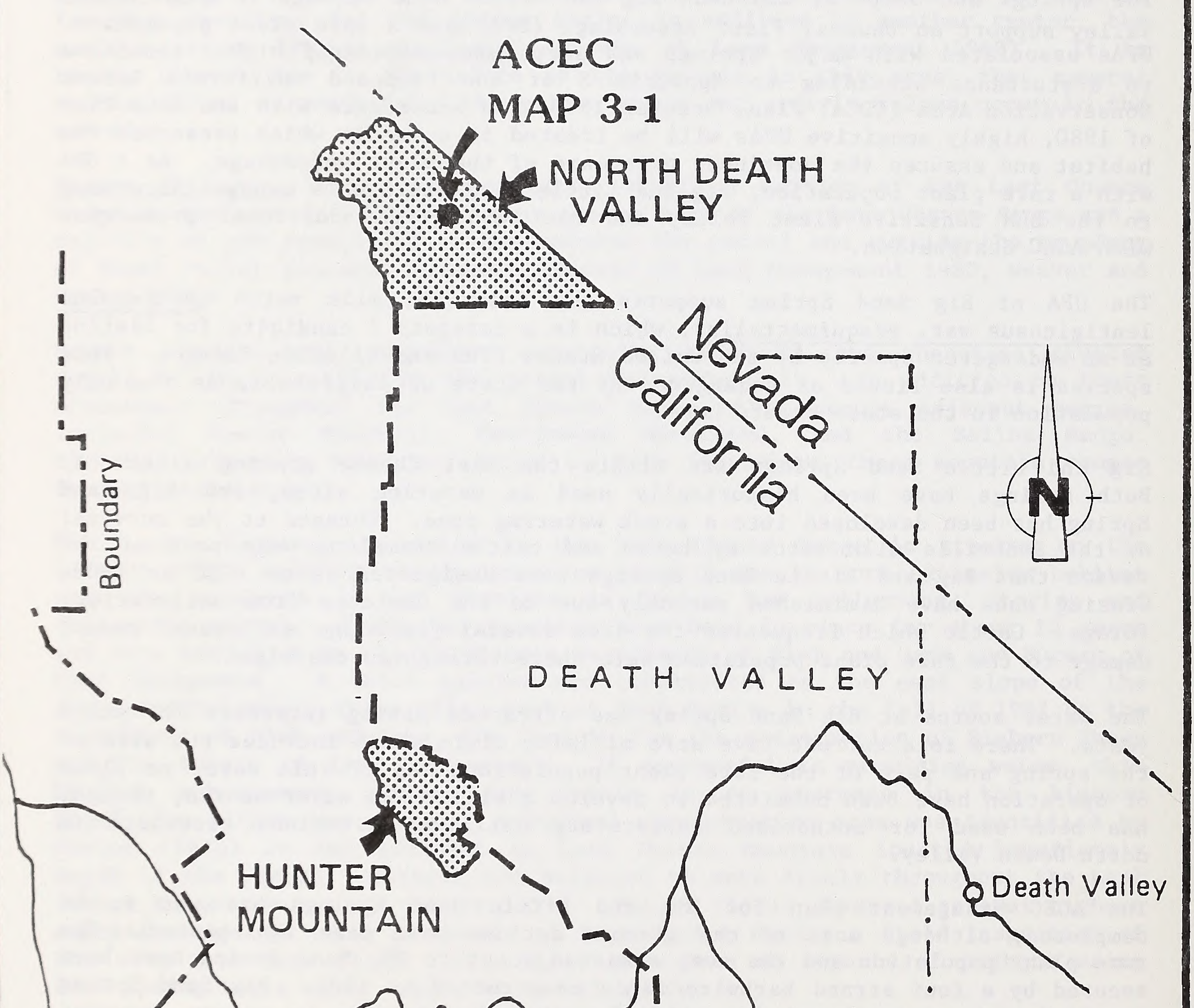
The UPA of Big Sand Spring supports the Sodaville milk vetch (*Astragalus lentiginosus var. sesquimetralis*), which is a category 1 candidate for listing as an endangered species by the United States Fish and Wildlife Service. This species is also listed as endangered by the State of California, as the only population in the state occurs here.

Big and Little Sand Springs are within the Last Chance grazing allotment. Both springs have been historically used as watering sites, and Big Sand Spring has been developed into a stock watering pond. Threats to the survival of the Sodaville milk vetch by burro and cattle trampling were part of the reason that Big and Little Sand Springs were designated as an ACEC in 1983. Grazing uses have diminished recently due to the distance from satisfactory forage. Cattle which frequented the area several years ago and caused severe damage to the rare plant population were there through an oversight.

The water source at Big Sand Spring has attracted mining interests in recent years. There is a current five acre millsite claim which includes the area of the spring and part of the rare plant population. As of this date, no plans of operation have been submitted to develop a mill. The water source, though, has been used for authorized exploratory drilling operations elsewhere in north Death Valley.

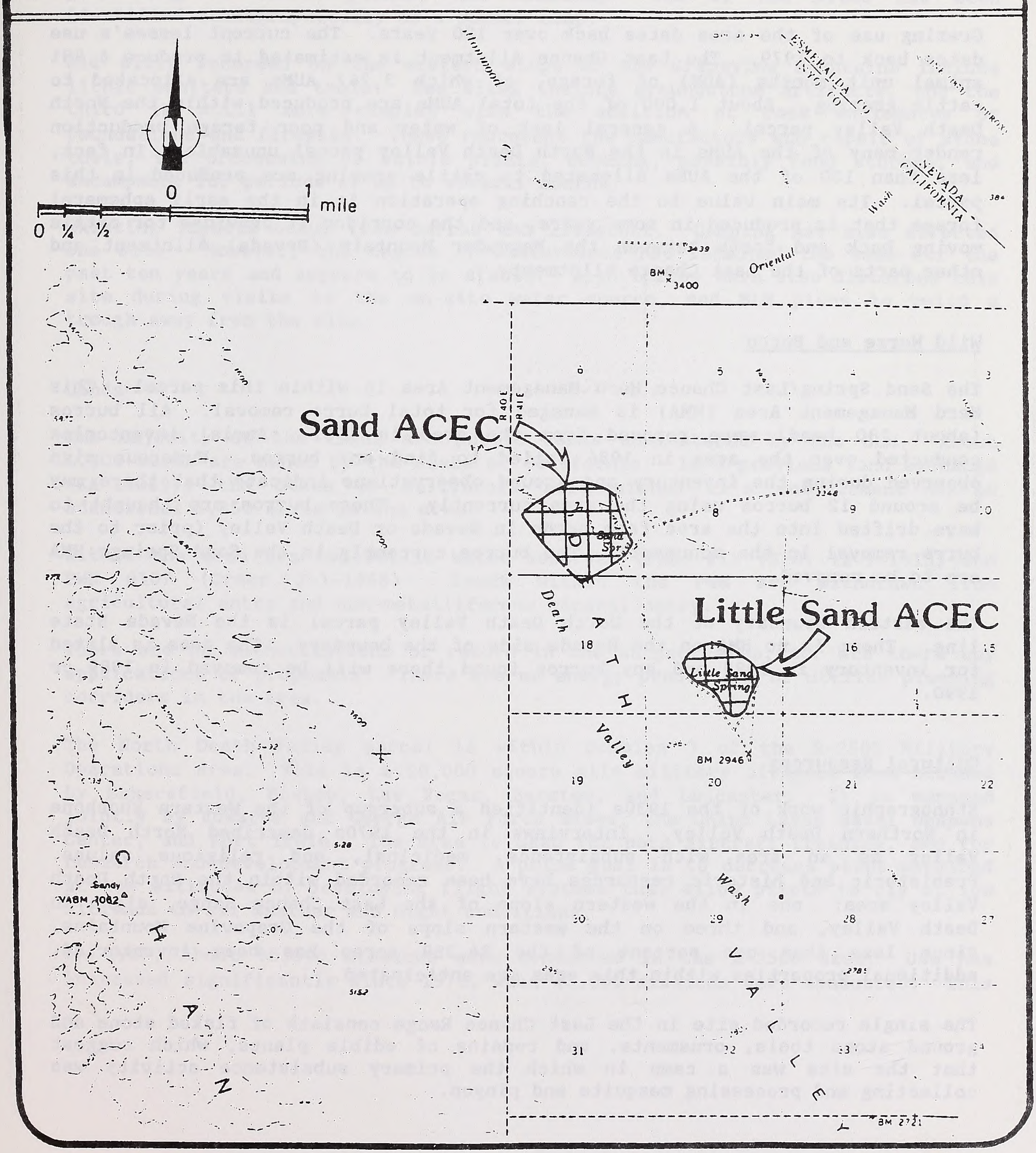
The ACEC management plan for Big and Little Sand Springs has yet to be completed, although most of the planned actions have been implemented. The rare plant population and the seep areas adjacent to Big Sand Spring have been secured by a four strand barbwire fence constructed in 1985. Big Sand Spring itself has been developed for wildlife, through dredging to remove emergent vegetation and to expand the pond area. Ranger patrols have been increased to maintain the integrity of the exclosures. The exclosure of Big Sand Spring itself, and the development of an alternative water supply for burros, has yet to be completed.

Big Sand and Little Sand Springs ACEC
INDEX


ACEC
MAP 3-1
NORTH DEATH VALLEY
Nevada
California
N
Boundary
DEATH VALLEY
HUNTER MOUNTAIN
Death Valley
190
NATIONAL
CDCA

Big Sand and Little Sand Springs Area of Critical Environmental Concern (ACEC)

MAP 3-1


0 ¼ ½ 0 1 mile
ESMERALDA CO
INYO CO
NEVADA
CALIFORNIA
Wash
Oriental
BM 3400
R40E
Sand ACEC
Sand Spr
Death
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Valley
Little Sand ACEC
Little Sand Spring
BM 2946
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Sandy
VABM 7082
BM 2721
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34

Livestock Grazing

The North Death Valley parcel contains a portion of the Last Chance Allotment. This allotment contains 110,000 acres of which about 39,000 acres are within the parcel. The current lessee (Jack Vogt, doing business as Lida Ranch) also leases the Magruder Mountain (Nevada) allotment which lies adjacent to the east side of the North Death Valley parcel.

Grazing use of the area dates back over 100 years. The current lessee's use dates back to 1979. The Last Chance Allotment is estimated to produce 6,981 animal unit months (AUM) of forage, of which 3,267 AUMs are allocated to cattle grazing. About 1,000 of the total AUMs are produced within the North Death Valley parcel. A general lack of water and poor forage production render many of the AUMs in the North Death Valley parcel unusable. In fact, less than 100 of the AUMs allocated to cattle grazing are produced in this parcel. Its main value to the ranching operation is in the early ephemeral forage that is produced in some years, and the corridor it provides for cattle moving back and forth between the Magruder Mountain (Nevada) Allotment and other parts of the Last Chance Allotment.

Wild Horse and Burro

The Sand Spring/Last Chance Herd Management Area is within this parcel. This Herd Management Area (HMA) is managed for total burro removal. All burros (about 130 head) were removed from the area in 1981. Aerial inventories conducted over the area in 1986 failed to find any burros. Numerous sign observed during the inventory and ground observations indicate that there may be around 12 burros using the area currently. These burros are thought to have drifted into the area from herds in Nevada or Death Valley (prior to the burro removal in the monument). The burros currently in the Sand Springs HMA are to be removed.

The eastern boundary of the North Death Valley parcel is the Nevada State line. There is no HMA on the Nevada side of the boundary. The area is slated for inventory in 1989 and any burros found there will be removed in 1989 or 1990.

Cultural Resources

Ethnographic work of the 1930s identified a subgroup of the Western Shoshone in Northern Death Valley. Interviews in the 1970s described North Death Valley as an area with subsistence, medicinal, and religious values. Prehistoric and historic resources have been recorded within the North Death Valley area: one in the western slope of the Last Chance Range, eight in Death Valley, and three on the western slope of the Grapevine Mountains. Since less than one percent of the 84,389 acres has been inventoried, additional properties within this area are anticipated.

The single recorded site in the Last Chance Range consists of flaked stone and ground stone tools, ornaments, and remains of edible plants, which suggest that the site was a camp in which the primary subsistence activity was collecting and processing mesquite and pinyon.

All of the sites in Death Valley include a lithic scatter, and five sites consist entirely of debitage and/or flakes. One site includes cores and bifaces; two, enclosures of rock; another, cores, flaked and ground stone tools, a historic cabin, a well, and historic artifacts associated with domestic and ranching activities. Uses inferred from these sites are the manufacture of stone tools, procurement of stone for tools, hunting, processing of edible plants, and ranching. One of the sites has been identified ethnographically as a summer camp.

All sites recorded on the western slope of the Grapevine Mountains include lithic scatters and tools. Two sites include groundstone artifacts, and the third is still more complex with the addition of rock enclosures or foundations and firepits. These represent the manufacture and repair of stone tools, the processing of edible plants, cooking, possibly food storage, and encampment for periods of up to several months.

Existing impacts occur from burros and livestock. Camping has also affected one site. However, the degree of disturbance has remained the same for the past ten years and appears to be stable. Wild burros have also disturbed this site during visits to the on-site water source, and BLM plans to build a trough away from the site.

Lands

The majority of the lands are public lands adminstered by the BLM. About 1,800 acres are owned by the State of California. In a previous land exchange (CA-15869), the State of California relinquished it's entitlement to an additional 3,850 acres in the area.

Within the area are two Public Water Reserves (PWR) #13 (E.O. 12-1-1913) and PWR #107 (Order 2-1-1968). Lands within the PWR are withdrawn from agricultural entry and non-metalliferous mineral entry.

There are no authorizations of record in the subject area, nor are there any applications or proposals. There are no energy production or utility planning corridors in the area.

The North Death Valley parcel is within Complex 3 of the R-2508 Military Operations Area. This is a 20,000 square mile military airspace zone bounded by Bakersfield, Bishop, Las Vegas, Barstow, and Lancaster. It is managed jointly by Edwards and George Air Force Bases, the China Lakes Naval Weapons Center, and Fort Irwin. The area is used for both aircraft training, and for research and development programs. A prime goal is to decrease pilot workload at low altitudes by developing flight systems that allow pilots to fly at low altitude in all weather and night conditions.

In 1987, about 90,000 missions were conducted in the R-2508 area. Use has increased significantly since 1978, when 43,000 missions were conducted. This increase has come about, in some cases, because of increased use by other bases. For example, the Lemore Naval Air Station previously used airspace over the California coast range and over the Pacific Ocean. Those areas are no longer as useful due to changes in technology and program needs. Consequently, Lemore is making much greater use of R-2508 (from 3 percent of total use in 1979 to 18 percent in 1987).

In 1977, the R-2508 Joint Policy and Planning Board signed a memorandum of agreement with the Federal Aviation Administration which prohibited flights below 3,000 feed above ground level (AGL) over the Death Valley National Monument.

Consequently aircraft on maneuvers, in an effort to stay well below this altitude, avoid the monument and fly around it via a "low-level high-speed terrain-following route" in order to reach the Nellis Range Complex in southern Nevada undetected. The present route around the north end of the monument crosses the North Death Valley Parcel. Military aircraft use of the area, generally not on prescribed flight paths, is authorized above 200 feet above ground level (AGL).

The CDCA Plan designated the area as multiple use class C (proposed wilderness; 72,709 acres), class L (limited; 9,920 acres) and class M (moderate; 1,760 acres). The multiple use class boundaries are shown on map 3-2. The Inyo County General Plan identifies the area as open space and multiple use.

Management Presence

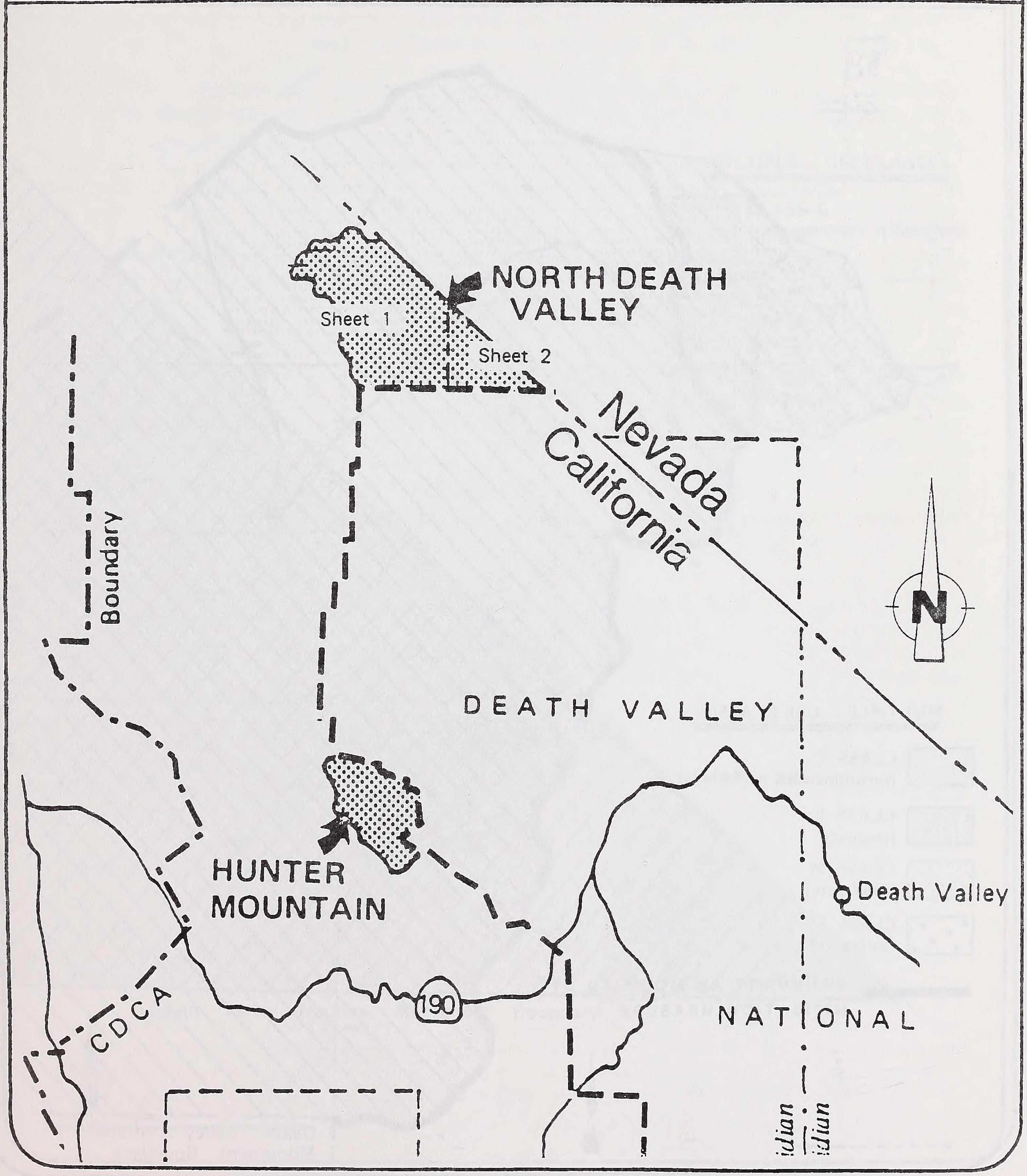
BLM's staff visited the parcel relatively infrequently prior to the recent (early 1988) expansion of BLM's ranger force. A ranger was based in Big Pine, and patrolled the parcel once a month. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis. This might occur, for example, due to the need to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. Such visits have averaged about once per month. BLM's resources staffing is also being expanded at the present time.

The recent expansion of BLM's ranger force has changed this situation significantly. The Big Pine ranger's patrol sector is smaller, and the ranger can visit the parcel twice each week.

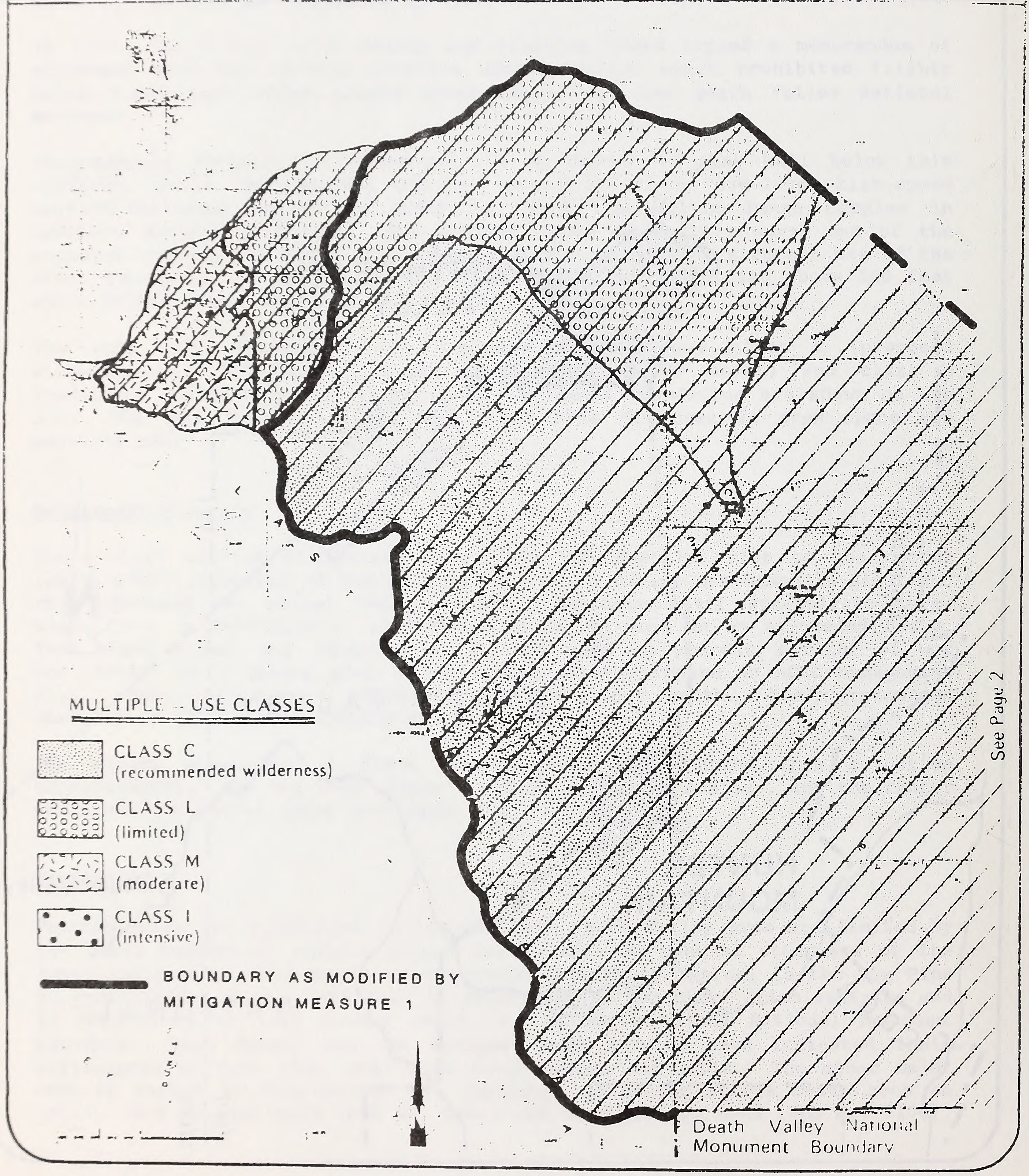
Recreation

Opportunities for recreation in the northern Death Valley area are limited by the small number of vehicle access routes and the general steepness of the local topography. The major access route through the parcel is the Big Pine to Death Valley Road. This road is accessible to two wheel drive vehicles and is maintained by Inyo County north of the Death Valley National Monument boundary. Inyo County and the National Park Service have indicated their willingness to pave this road when funds become available. The other major vehicle routes in this parcel are ranching and mining access roads such as Little Sand Springs Road (BLM No. F107) and Sand Springs Road (BLM No. F106).

North Death Valley Index
BLM - CDCA Plan Multiple-Use Class Map 3-2

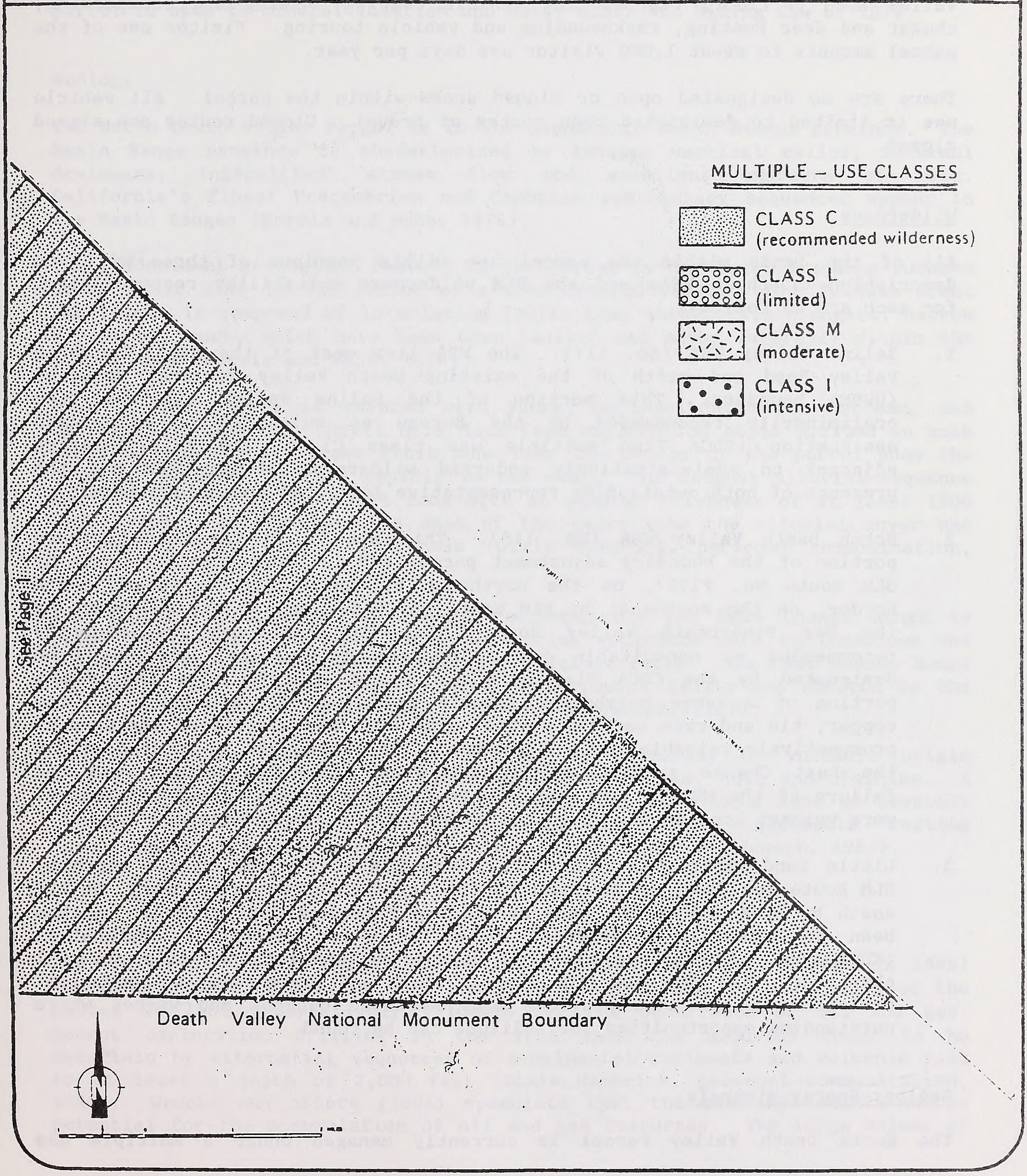

NORTH DEATH VALLEY
Sheet 1
Sheet 2
Nevada
California
Boundary
N
DEATH VALLEY
HUNTER MOUNTAIN
Death Valley
190
CDCA
NATIONAL

North Death Valley
BLM - CDCA Plan Multiple-Use Class Map Map 3-2


MULTIPLE - USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
BOUNDARY AS MODIFIED BY MITIGATION MEASURE 1
N
See Page 2
Death Valley National Monument Boundary

Sheet 1 of 2

North Death Valley
BLM - CDCA Plan Multiple-Use Class Map MAP 3-2


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
See Page 1
Death Valley National Monument Boundary
N

Sheet 2 of 2

Route 106 serves as a boundary between BLM WSA 118 and WSA 119. A well established ranching road (BLM No. F1987) also makes up the northern edge of this boundary adjustment area. There are several other spur routes off of the major roads in this parcel. These routes provide access for visitors to the parcel. These visitors are mostly concentrated along the Big Pine/Death Valley Road corridor, representing vehicle camping, hiking and backpacking, chukar and deer hunting, rockhounding and vehicle touring. Visitor use of the parcel amounts to about 1,000 visitor use days per year.

There are no designated open or closed areas within the parcel. All vehicle use is limited to designated open routes of travel. Closed routes are signed closed.

Wilderness

All of the lands within the parcel are within portions of three WSAs. A description of these WSAs and the BLM wilderness suitability recommendation for each are as follows:

1. Saline Valley WSA (No. 117). The WSA lies west of the Big Pine/Death Valley Road and north of the existing Death Valley National Monument (DVNM) boundary. This portion of the Saline Valley WSA has been preliminarily recommended by the Bureau as suitable for wilderness designation (CDCA Plan multiple use class C) due to it's location adjacent to administratively endorsed wilderness within DVNM and the presence of both outstanding representative landforms and unique features.

2. North Death Valley WSA (No. 118). This WSA is in the most northern portion of the boundary adjustment parcel and is bounded on the north by BLM Route No. F1987, on the northeast by the California/Nevada state border, on the southeast by BLM Route No. F106, and on the southwest by the Big Pine/Death Valley Road. This WSA has been preliminarily recommended as nonsuitable for wilderness designation, and has been designated by the CDCA Plan as class L and M. The site includes a portion of a large molybdenum deposit and also displays potential for copper, tin and rare earth minerals. The USGS has classified the area as prospectively valuable for oil and gas. The entire WSA is located within the Last Chance grazing allotment. These resource values, and the failure of the WSA to meet any of the desert-wide wilderness objectives, were primary considerations in the nonsuitable recommendation.

3. Little Sand Spring WSA (No. 119). This WSA is bounded on the north by BLM Route No. F106, on the east by the California/Nevada boundary, on the south by DVNM and on the west by the Big Pine/Death Valley Road. It has been preliminarily recommended as suitable for wilderness designation (CDCA Plan multiple use class C) because it has retained it's primeval character, and because the large size and extensive topographical variation of the area provides many secluded canyons and washes where outstanding opportunities for solitude can be found.

Geology-Energy-Minerals

The North Death Valley Parcel is currently managed under a multiple use concept. Mineral exploration and extraction is governed under the Mining Law of 1872 (and amendments), the Mineral Leasing Act of 1920, the Mineral Materials Act of 1947 (as amended in 1955 by P.L. 167), the Geothermal Steam Act of 1970 and the Federal Land and Policy Management Act of 1976. There are approximately 1,800 acres of private fee land within the parcel and no split-estate (public surface, private subsurface). Federal land within the parcel is open to mineral location and entry under the Mining Law of 1872.

Geology

The North Death Valley Parcel is in the geomorphic Basin Ranges province. The Basin Range province is characterized by extreme vertical relief, internal drainages, intermittent stream flow and excellent exposure of rock. California's finest Precambrian and Cambrian sedimentary sequences appear in the Basin Ranges (Norris and Webb, 1976).

The predominant geological feature in the parcel is northwest trending Furnace Creek Fault Zone in the center of a down-dropped valley. The Furnace Creek Fault Zone is composed of interlacing faults that incorporate elongate, narrow slices of crust, which have been down faulted and moved laterally within the parcel area (Norris and Webb, 1976).

Much of the parcel is covered with young, unconsolidated fan, stream, and valley fill deposits. Drill hole data from exploration holes drilled on both sides of the Furnace Creek Fault Zone near the center of the parcel show the alluvial sequence to thin rapidly to the east. The deepest alluvial sequence was to the west of the fault zone with an unknown thickness of at least 1500 feet. Approximately one mile east of the fault zone the alluvial cover had thinned to 290 feet in thickness (Dixie Hambrick, personal communication, 1988).

The western portion of the parcel, encompassing the Last Chance Range is primarily composed of older Paleozoic marine sediments such as limestone and dolomite, overlain by younger, Tertiary volcanic rocks. The Last Chance Range is highly faulted and broken by high angle normal faults and sheared by the low angle Last Chance thrust fault (Taylor and Joseph, 1987).

The southeastern portion of the parcel is primarily of volcanic origin composed of basalt flows, ash flows, rhyolite, dacite, tuff and obsidian. A smaller area in the southeastern portion of the area is a zone of severely thrust faulted slices of older, paleozoic marine sediments resting unconformably over the younger volcanic terain (Taylor and Joseph, 1987).

Energy

The United States Geological Survey (USGS), classified (as amended in 1985) the central part (T 9 S., R 40 E., west half and T. 9 S., R 41 E, all) of the parcel as land prospectively valuable for the occurrence of oil and gas. Recent exploration drilling in the area show the alluvial cover to be underlain by alternating sequences of continental sediments and volcanic rock to at least a depth of 2,000 feet (Dixie Hambrick, personal communication, 1988). Wrucke and others (1984) speculate that the area has little or no potential for the accumulation of oil and gas resources. The large volume of

Mesozoic intrusive rock in the area would have provided sufficient heat to drive off or degrade any accumulation of hydrocarbons in pre-Tertiary rock.

Minerals

Leases and Mining Claims: A review of the BLM mining claim records (April 12, 1988 version) reveals the existance of 169 lode claims, 11 placer claims and 1 millsite in the parcel. The majority of claims are concentrated in the vicinity of the Crater Mine area. A number of these claims were located prior to 1976. A second, newer group of claims are concentrated south of Little Sand Spring in the center of the parcel. The third concentration of claims are located in the southeast portion of the parcel near the northern boundary of Death Valley National Monument.

Mineral Potential Overview: Mines and prospects within the parcel have produced substantial quantities of sulphur and mercury. The northeastern portion of the area is underlain by a small part of a massive disseminated molybdenum deposit. The area surrounding Crater has a moderate to high potential for the occurrence of mercury, sulphur, gypsum, and gold. An area on the extreme eastern border of the parcel has moderate potential for the occurrence of silver. An area on the southern border of the parcel and two isolated areas in the central and southwestern portion of the parcel have moderate potential for the occurrence of gold and silver mineralization. A small area in the central portion of the parcel has moderate potential for the occurrence of borate minerals. Limestone deposits are extensive in the western part of the parcel. Map 3-3 shows the areas of mineral potential and defines the high and moderate classifications.

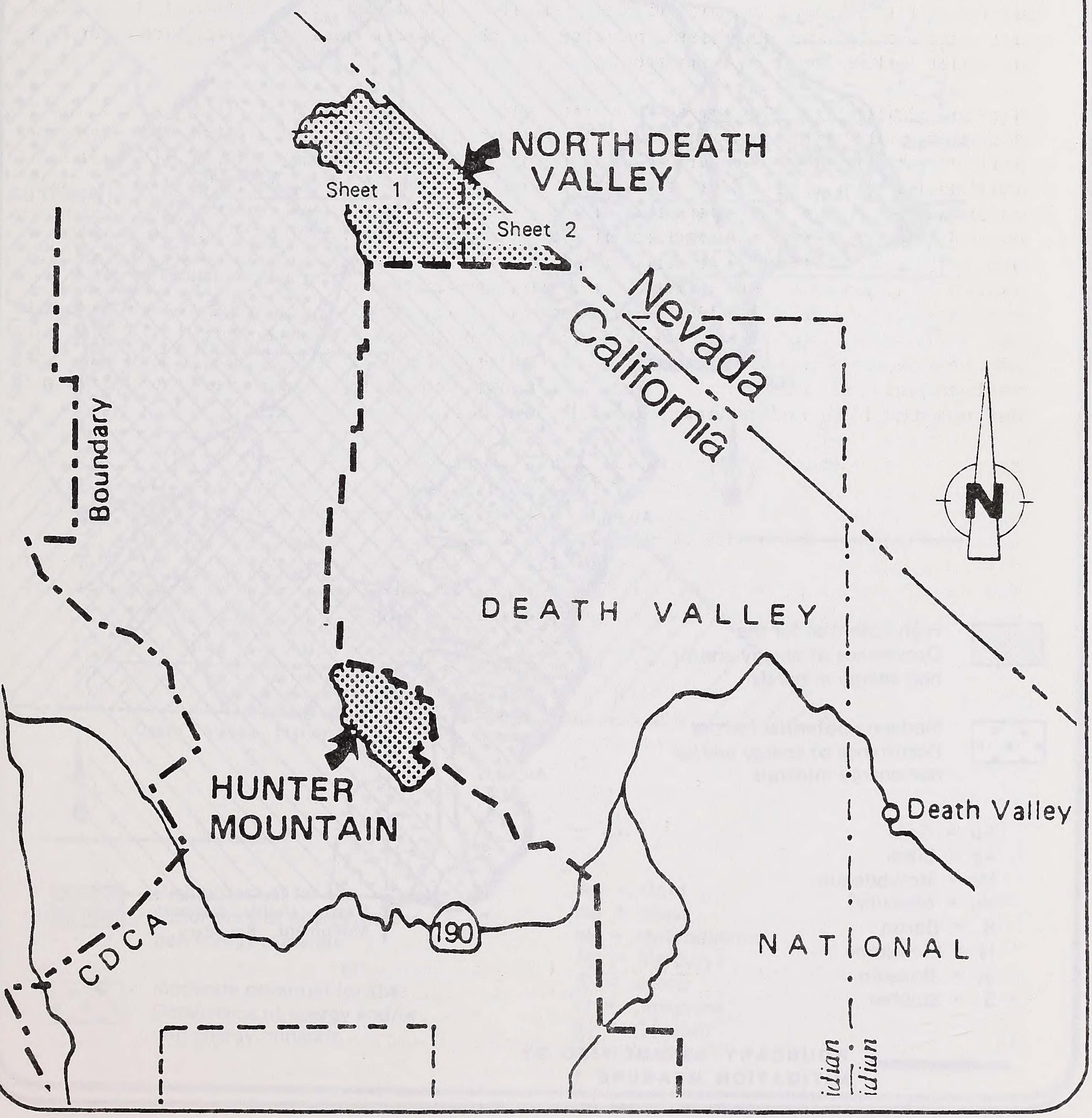
Mercury: Cinnibar, a mercury ore, was mined from Crater southward along the Last Chance Range until 1971. Mining activity occurred at the time of high mercury prices, $536 per flask in 1968; activity in this area ceased when prices droppped to under $300 per flask in 1971 (Taylor and Joseph, 1987). Numerous mercury mines and prospects combined with anomalous geochemical values of mercury (Miller, 1983) provide the basis for the high to moderate mercury potential classification in the northwestern part of the parcel.

Sulphur: Substantial deposits of sulphur were discovered in the Last Chance Range in 1915 with production beginning in 1929 at the Crater mine and continuing intermittently until 1969 (Taylor and Joseph, 1987). The Crater Group is considered to be the largest known deposit of sulphur in California. A conservative estimate places the reserves on the Crater Group of claims at 1,350,000 tons of 40 percent sulphur (Norman and Miller, 1951). The area surrounding the Crater mine has a high to moderate potential for the occurrence of sulphur deposits.

Gypsum: Gypsum occurs in a series of Tertiary rock, in the form of gypsum-impregnated limestone breccias in association with sulphur in the Crater area (Norman and Miller, 1951). The Crater area has undergone extensive hydrothermal alteration (Taylor and Joseph, 1987) which may be source of fluids for the metamorphism of limestone and deposition of hydrous calcium sulfate (gypsum) mineralization. The area surrounding the Crater mine has a moderate potential for the occurrence of undiscovered deposits of gypsum.

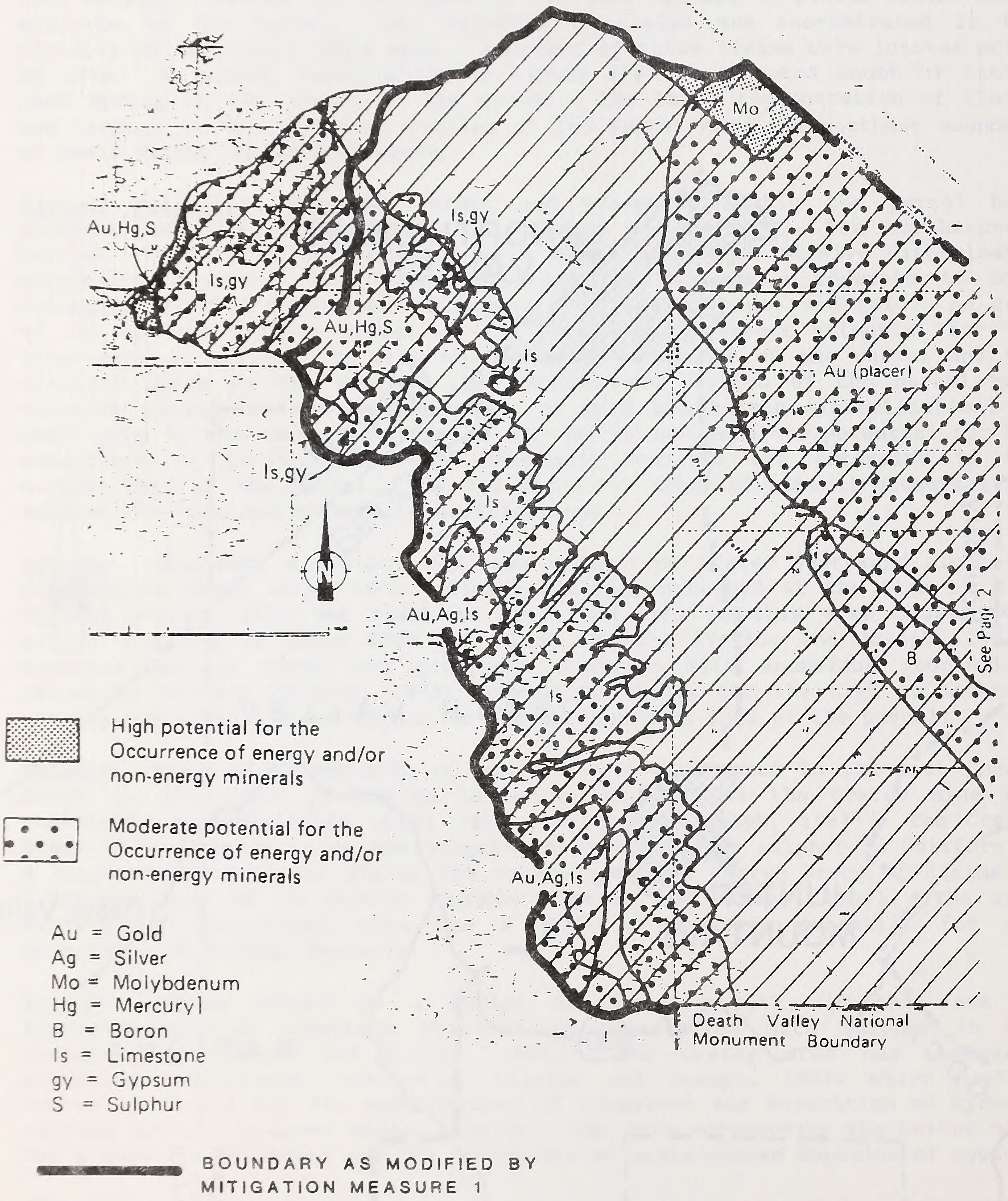
North Death Valley Index
Mineral Resources Potential

MAP 3-3


NORTH DEATH VALLEY
Sheet 1
Sheet 2
Nevada
California
Boundary
N
DEATH VALLEY
HUNTER MOUNTAIN
Death Valley
190
CDCA
NATIONAL
idian
idian

North Death Valley Mineral Resources Potential

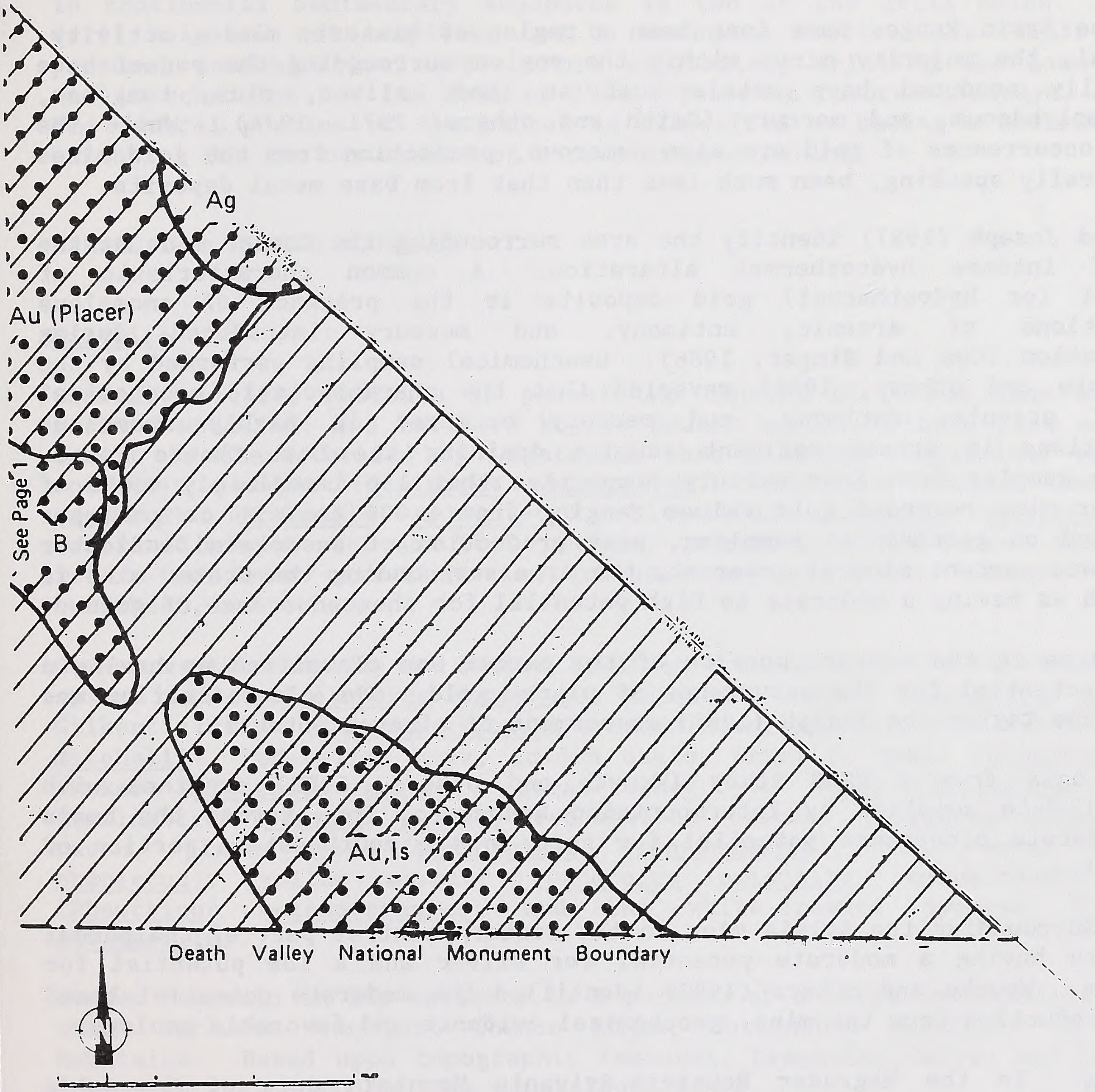
MAP 3-3


Mo
Au,Hg,S
Is,gy
Is,gy
Au,Hg,S
Is
Au (placer)
Is,gy
Is
N
Au,Ag,Is
See Page 2
B
Is
Au,Ag,Is
Death Valley National Monument Boundary
▨ High potential for the Occurrence of energy and/or non-energy minerals
⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals
Au = Gold
Ag = Silver
Mo = Molybdenum
Hg = Mercury]
B = Boron
Is = Limestone
gy = Gypsum
S = Sulphur
BOUNDARY AS MODIFIED BY MITIGATION MEASURE 1

Sheet 1 of 2

North Death Valley

Minerals Resources Potential MAP 3-3


Ag
Au (Placer)
See Page 1
B
Au,ls
Death Valley National Monument Boundary
N

▨	High potential for the Occurrence of energy and/or non-energy minerals
●	Moderate potential for the Occurrence of energy and/or non-energy minerals

Au = Gold
Ag = Silver
Mo = Molybdenum
Hg = Mercury]
B = Boron
ls = Limestone
gy = Gypsum
S = Sulphur

Sheet 2 of 2

Limestone: Carbonate rock is present in small (less than several thousand feet long) to large (more than several miles long) masses consisting of limestone, dolomite and marble of various composition. Only minor historic production has been recorded within the parcel area; however, age- and composition-equivalent rocks have been extensively mined elsewhere in the desert region. These units could represent important resources of carbonate rock suitable for a number of industrial uses (Taylor and Joseph, 1987). Based on a developmental likelihood, the limestone within the parcel has a low to moderate potential for the occurrence of limestone deposits.

Gold: The Basin Ranges have long been a region of historic mining activity. In general, the majority mines within the region surrounding the parcel have historically produced base metals such as lead, silver, zinc, tungsten, copper, molybdenum, and mercury (Smith and others, 1971, 1974). While the reported occurrences of gold are also numerous, production from the gold mines has, generally speaking, been much less than that from base metal deposits.

Taylor and Joseph (1987) identify the area surrounding the Crater mine as the locus of intense hydrothermal alteration. A common characteristic of epithermal (or hydrothermal) gold deposits is the presence of anomalous concentrations of arsenic, antimony, and mercury introduced during mineralization (Cox and Singer, 1986). Geochemical sampling performed by the USGS (Wruke and others, 1984) revealed that the characteristic geochemical suite of arsenic, antimony, and mercury occurred in highly anomalous concentrations in stream sediment samples draining the Last Chance Range. Rock chip samples from four mercury properties that lie immediately south of the Crater mine recorded gold values ranging from 0.006 to 0.28 oz gold per ton. Based on geochemical sampling, past production of associated indicator minerals and current mineral interest, the area surrounding the Crater mine is classified as having a moderate to high potential for the occurrence of gold.

A large area in the eastern portion of the parcel was classified as having a moderate potential for the occurrence of placer gold. The classification was based on the Taylor and Joseph (1987) assessment of mineral potential.

Existing data from a USGS study (Wrucke and others, 1983) combined with additional data supplied by Intermountaion Resources, Inc. formed the basis for a moderate occurrence potential for gold in the southeastern portion of the parcel.

Silver: Surrounding the Sylvia mine in the eastern central part of the parcel is an area having a moderate potential for silver and a low potential for molybdenum. Wrucke and others (1983) identified the moderate potential based on past production from the mine, geochemical evidence and favorable geology.

Molybdenum: In the Magruder Mountain-Sylvania Mountain area of Esmerelda County, Nevada, three molybdenum deposits have been known and actively explored since 1960 (Taylor and Joseph, 1987). The deposits were known as the Sylvania mine, Cucomongo deposit and McBoyle deposit, all located within close proximity to the California-Nevada border. During the period form 1969 to 1975, 15 diamond drill holes that produced about 17,000 feet of drill core were drilled by Amoco-Marathon on the Ace Hills, near the headwaters of Copper Canyon (Taylor and Joseph, 1987). The BLM Final EIS and Proposed plan for the CDCA, volume G, page 79, cite, on the basis of proprietary data, a resoure figure of 1,600,000 lbs of molybdenum for the Stateline (combined Sylvania, Cucomongo and McBoyle) deposit. The southern extension of the Stateline deposit, in the northeast part of the parcel area, is classified as having a high potential for the occurrence of molybdenum.

Boron (Borates): The southern and central Death Valley regions have long been producers of borate compounds. McAllister (1970) describes the principal borate deposits to be in continental sedimentary rocks near the base of the Furnace Creek Formation. In 1987, a major borate production company drilled three deep exploration holes in the central portion of the parcel in the search for borate mineralization. Anomalous values of boron were discovered in continental sedimentary sequences in two of the drill holes. The third drill hole was not completed due to technical difficulties (Dixie Hambrick, personal communication, 1987). More exploratory drilling has been permitted and is scheduled for the fall of 1988. Based on favorable assays, an area in the central portion of the parcel is classified as having a moderate to high potential for the occurrence of borate mineralization.

PARCEL TWO: HUNTER MOUNTAIN

Wildlife

General wildlife habitats in parcel two consist of pinyon pine and juniper forest, woodland, and northern Mojave Desert scrub. Pinyon pine and juniper forest is characterized by vegetation that includes single-leaf pinyon pine and Utah juniper (Juniperus osteosperma). Woodland habitat includes big sagebrush (Artemisia tridentata), bitterbrush (Purshia glandulosa), and scattered pinyon pine and Utah juniper. Northern Mojave Desert scrub habitat is in the lower elevations and includes creosote bush, bursage, joint-fir, buckwheat, and others.

Common vertebrates in the Hunter Mountain area include the chuckwalla, desert spiny lizard (Sceloporus magister), sagebrush lizard (Sceloporus graciosus), Gilbert's skink (Eumeces gilberti), sidewinder, speckled rattlesnake (Crotalus mitchelli), red-tailed hawk, golden eagle, mountain quail (Oreortyx pictus), chukar (Alectoris graeca), great-horned owl (Bubo virginianus), Costa's hummingbird (Calypte costa), red-shafted flicker (Colaptes cafer), common raven, pinyon jay (Gymnorhinus cyanocephalus), rock wren (Salpinctes obsoletus), yellow warbler (Dendroica petechia), black-headed grosbeak (Pheucticus melanocephalus) and the white-crowned sparrow (Zonotrichia atricapilla).

Hunter Mountain in its entirety is a portion of a larger mountainous ecosystem which includes the Last Chance Range, Cottonwood Mountains and Panamint Mountains. Based upon topographic features, Grapevine Canyon and Mill Canyon form a natural break in this mountainous block.

Unique Habitats

Within the generalized habitats occur riparian and aquatic habitats which are extremely important to a great majority of the fauna. Many amphibians, reptiles, birds and mammals require riparian and aquatic habitats to varying degrees to survive. The known aquatic and riparian habitats within the parcel by name or geographic location are as follows:

Grapevine Canyon
Jackass Canyon
Mill Canyon
Unnamed springs east of Mill Canyon
Quail Spring
Jackass Spring
Dead Horse Spring
Spanish Spring
Big Dodd Spring
Little Dodd Spring
Unnamed springs in canyon south of Little Dodd Spring

Significant Species

Desert Bighorn: Desert bighorn, a sensitive species, occurs in suitable habitat throughout the parcel (map 3-3; note habitat areas A and B). A majority of the recorded bighorn sightings have been in the Grapevine Canyon and Dodd Springs areas. About 30 bighorn are believed to occur within the parcel, and about 20 of these are located in the area where most of the sightings have occurred (Aardahl, personal communication; Blankinship, personal communication, Weaver and Mensch 1970, Weaver 1982).

Bighorn, primarily rams, have the ability to travel extensively throughout the area. The Hunter Mountain area is actually at the intersection of several "corridors" used by bighorn to access adjacent mountain ranges, specifically the Panamint, Cottonwood, Last Chance, Nelson and Inyo. Bighorn travel extensively throughout the mountain ranges that are contiguous to Hunter Mountain.

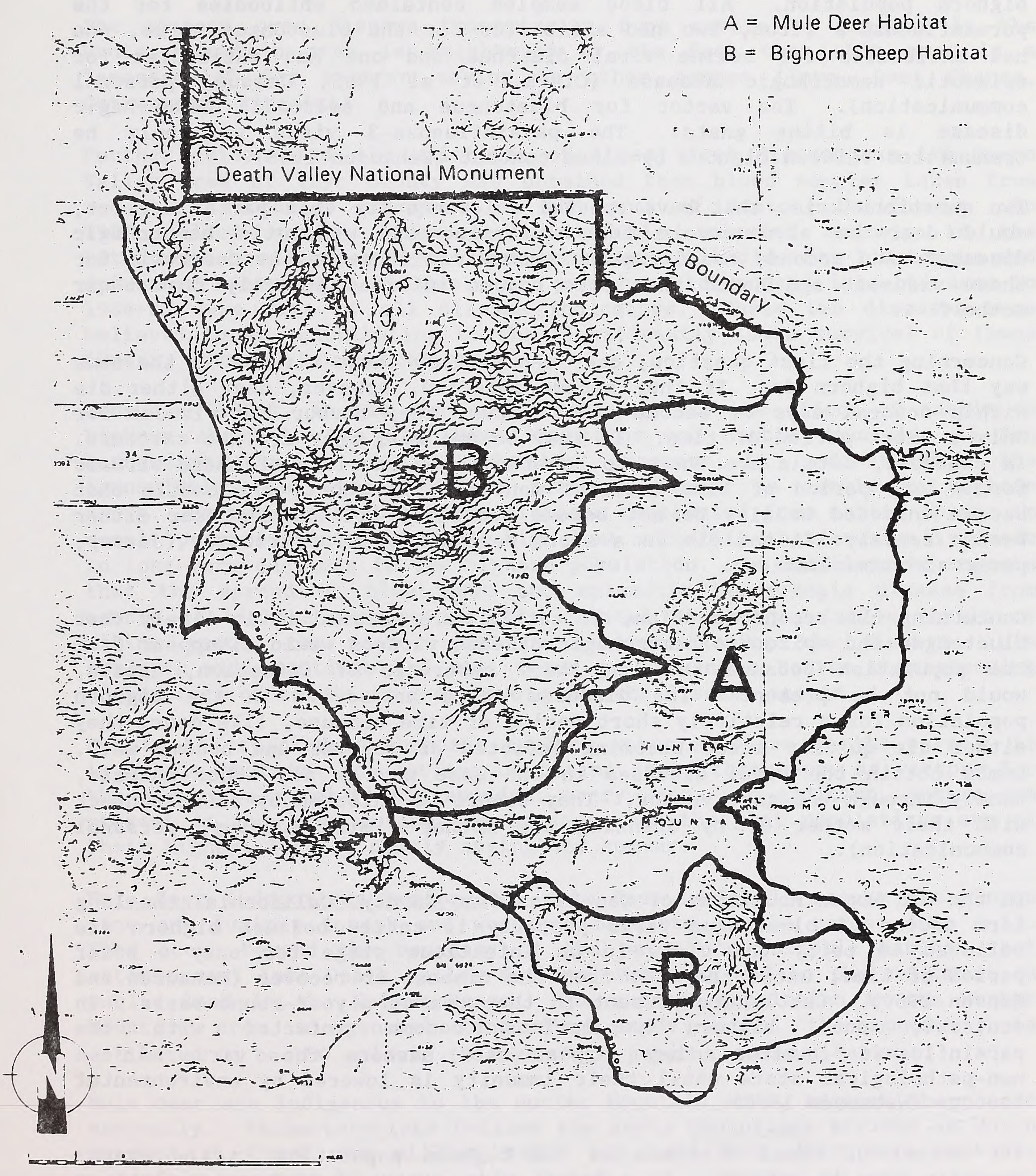
The Hunter Mountain area, and habitat area B in particular, are important areas for bighorn and other wildlife. The area exhibits considerable altitudinal variation, relatively abundant surface water compared to surrounding areas, and contains a variety of distinct habitats that allow for great species diversity. The rugged topography and surface water in habitat area B, especially in the Grapevine Canyon and Dodd Springs areas, is ideal bighorn habitat that is highly favored by this species.

Bighorn sheep habitat is starting to recover from past overgrazing by wild horses and burros (and by cattle to a lesser extent). Maintaining the number of large ungulates at proper levels since the early 1980s has allowed the habitat to improve sufficiently to permit the depressed population of 30 animals to begin to return to its optimum level.

Viral Disease Transmission from Cattle to Bighorn: According to Jessup (1983), bighorn sheep are likely the most sensitive wild ungulate in North America to diseases and parasites common to domestic livestock. Livestock, in this case, refers to cattle and sheep and not burros or horses. Jessup (1983), in a letter to the U.S. Forest Service, stated that he knew of no disease common to horses or burros which reportedly affect bighorn sheep.

Hunter Mountain Habitat

MAP 3-4


A = Mule Deer Habitat
B = Bighorn Sheep Habitat
Death Valley National Monument
Boundary
B
A
HUNTER
MOUNTAIN
B

Between 1983 and 1985, the California Department of Fish and Game conducted a study of the incidence of diseases in wild populations of bighorn sheep in mountain ranges in the desert regions. (Refer to Fish and Game summary in Appendix D on circumstantial evidence on relationship between bighorn sheep, infectious diseases and livestock). Blood samples were taken and analyzed for evidence of viral diseases common to domestic livestock. Blood samples from three bighorn taken from Hunter Mountain revealed evidence that disease agents common to domestic livestock were likely present. The evidence, in the form of serum antibodies, revealed that four viral disease agents common to cattle were present in the bighorn population. All blood samples contained antibodies for the parainfluenza-3 virus, two had antibodies for the bluetongue virus, one had antibodies for bovine viral diarrhea and one had antibodies for epizootic hemorrhagic disease (Clark, et al 1985; Jessup, personal communication). The vector for bluetongue and epizootic hemorrhagic disease is biting gnats. The parainfluenza-3 virus may only be transmitted between bighorn by close contact (Wehausen 1988).

Two questions arise that have special relevance for this parcel. First, could deer be a reservoir for bluetongue and epizootic hemorrhagic disease? And second, could bighorn themselves serve as the reservoir for these viruses, and could the lambs become infected directly from their mother?

Concerning the first question, deer can acquire these viruses in the same way that bighorn do. If they become infected, however, deer either die within several days or become well. Thus, they harbor the viruses for only a short period of time. If they become well they are not carriers. In contrast, cattle are known to be able to be carriers of these viruses for a long period of time (several months). In short, the cattle that become infected usually do not become seriously ill whereas deer either become acutely ill and die in a short period of time or recover (Jessup, personal communication).

Concerning the second question, if cattle were removed it is likely that bluetongue and epizootic hemorrhagic disease viruses would disappear from the population because the long term reservoir of infection, cattle, would not be present. The diseases could be active in the bighorn population for a relatively short period of time because, like deer, they either die quickly after becoming infected or recover and become well. Lambs obtain the viral diseases in the same way as all other animals, namely through the gnat vector. They cannot be infected by close contact with their mother or by drinking the mother's milk (Jessup, personal communication).

In the Old Woman Mountains of San Bernardino County, California, the long term source of bluetongue virus probably is cattle because bighorn are believed to carry the virus in an infectious stage for only a brief period of time, until they die from the disease or recover (Wehausen and Hansen 1986). Cattle are present in the area on a year-round basis. In contrast, once bighorn populations become infected with the parainfluenza-3 virus they appear to harbor the virus in a non-pathological state until their immunity is lowered by environmental factors (Wehausen 1988).

The effect of these diseases on the bighorn population in the Hunter Mountain area is unknown. In a desert wide survey of bighorn populations and diseases, it was determined that four herds with increasing populations were relatively free of evidence of diseases common to cattle (Clark, et al 1985). It was also determined that four other herds in the desert with stable or decreasing populations contained evidence of significant levels of disease agents common to cattle. Three viruses, bluetongue, epizootic hemorrhagic disease and parainfluenza-3, have been related to significant lowered recruitment of bighorn lambs into the population in the Santa Rosa Mountains in Riverside County, California, since 1977 (Wehausen 1986).

The concern over disease transmission from cattle to bighorn in the Hunter Mountain area is heightened by the fact that this area is a "crossroads" for bighorn moving to other ranges (Inyo, Last Chance, Cottonwood, Panamint).

Further evidence of the existence of these viral diseases in the Owens Valley area of Inyo County was obtained from blood samples taken from recently introduced pronghorn in the area of Benton, California. In 1987, blood samples from three randomly selected animals in the introduced herd were analyzed and contained antibodies for bluetongue and epizootic hemorrhagic disease. All pronghorn introduced into the area in 1984-85 were free of all disease indicators. These two diseases were believed to be contributing to the significantly lower survival of fawns (Russi, personal communication).

Wehausen (1988), in his continued research into the effect of cattle on bighorn sheep in the Old Woman Mountains and Marble Mountains of San Bernardino County, reports further progress in understanding the transmission and effect of two diseases common to cattle on bighorn sheep. He reports that bighorn diseases contracted from cattle appear to result primarily in unnaturally high lamb mortality that eventually leads to long-term declines in the bighorn population. In addition, he reports that the spread of bluetongue and epizootic hemorrhagic disease from cattle to bighorn appears directly related to the population levels of biting gnats, the vector for the viruses causing the disease. His research will continue and will focus on gaining a better understanding of the role of cattle as a reservoir for the disease agents.

Due to the relatively abundant surface water supplies in the parcel, it is likely that the populations of biting gnats that serve as vectors for the viruses are relatively abundant every year. In addition, cattle are present in the area during the seasons when the gnat populations are at their highest levels, namely spring and summer.

Mule Deer (Odocoileus hemionus): Mule deer typically occupy the pinyon pine and juniper forest and woodland habitats in the parcel (map 3-3). They occur beyond the boundary of the parcel in suitable habitat that extends east into Death Valley National Monument and to the southwest on public land in the Nelson Range. The current population in the Hunter Mountain area in general (including lands within the monument) is estimated to be 150 animals (Blankinship, personal communication).

Mule deer are indigenous to the Hunter Mountain area, meaning they occur naturally. Paleontologists believe the genus Odocoileus arrived in North America at least two million years ago, and that deer have probably resided in the southern quarter of their range in the southwest, including portions of Mexico, continuously since their occurrence in North America (Wallmo 1981).

Mule deer populations fluctuate due to a variety of environmental factors, including forage availability and quality, predation, disease and possibly hunting pressure in some areas. Deer population levels or densities in an area directly influence the frequency of observations. Populations in the intermountain west reportedly increased in many areas between 1930 and 1960.

The reason for this change, according to Greull (1986) was succession of vegetation in the habitat from a condition dominated by grasses to one dominated by woody shrubs. Intensive livestock grazing and a reduction in the frequency and extent of fires led to this shift in vegetation. Deer favor habitat containing browse as opposed to grasses. However, the reported increase in deer populations throughout the intermountain west has generally ended and declines are widespread as woody plants become overly mature and dense, native bunchgrasses have been removed by excessive grazing and government agencies have become more involved in fire suppression (Gruell 1986).

Mule deer are hunted in the parcel and on adjacent public lands during the fall season. Most if not all hunting (and deer taken) occurs in the vicinity of the Hunter Mountain road from Jackass Spring to Spanish Spring, and the average annual deer harvest from this area is approximately six animals (Blankinship, personal communication). Hunting pressure and harvest in the parcel is relatively low, but those who participate in the sport derive considerable enjoyment from this wilderness type of hunting area.

Mountain Lion (Felis concolor): Mountain lion naturally occur in the parcel, especially within the pinyon pine and juniper forests and rocky areas. They are most often associated with mule deer, the primary prey species. Mountain lions may also prey upon other species, including bighorn sheep, jackrabbit, and coyote. However, other predators, including coyote, bobcat and golden eagle also prey on bighorn in addition to other species (Kelly 1981).

Slender Salamander (Batrachoseps sp.): There is potential for a species of slender salamander to occur in riparian and aquatic habitats in Grapevine and Jackass Canyons. The nearest known occurrence of a slender salamander, the Inyo Mountains salamander (Batrachoseps campi), is approximately 20 miles to the northwest in several canyons in the Inyo Mountains (Giuliani, no date). This salamander is a candidate for proposed listing as a threatened or endangered species under the Federal Endangered Species Act (U.S. Fish and Wildlife Service 1985).

Panamint Alligator Lizard (Elgaria panamintinus): The Panamint alligator lizard occurs in and adjacent to riparian habitat in Grapevine Canyon (Banta 1963), and possibly other similar habitats in the parcel, such as Jackass Canyon, Mill Canyon, etc. This species is a candidate for proposed listing as a threatened or endangered species under the Federal Endangered Species Act (U.S. Fish and Wildlife Service 1985).

Panamint Kangaroo Rat (Dipodomys panamintinus panamintinus): The Panamint kangaroo rat occurs throughout the parcel and in limited areas outside the parcel in Death Valley National Monument and the Nelson Range. This population is one of three known populations of this subspecies in the northern Mojave Desert. The other two are located in the Argus Range within the China Lake Naval Weapons Center and in South Park of the Panamint Range (Bureau of Land Management 1980). It is considered significant due to its limited distribution.

Birds of Prey: One red-tailed hawk (Buteo jamaicensis) nest site has been recorded in the lower Grapevine Canyon area, based upon a helicopter survey conducted in 1977 (Thelander 1977). Additional surveys in the parcel would probably reveal the occurrence of other raptor nesting sites.

Upland Game Birds: Mountain quail (Oreortyx pictus) and chukar (Alectoris graeca) are common in portions of the parcel. The chukar is an introduced exotic species that provides considerable sport hunting opportunity. Both species are hunted annually during established hunting seasons in the fall and winter.

Botany

There are no known BLM sensitive, state-listed rare or endangered, or Federal-listed threatened or endangered plant species in this parcel.

Livestock Grazing

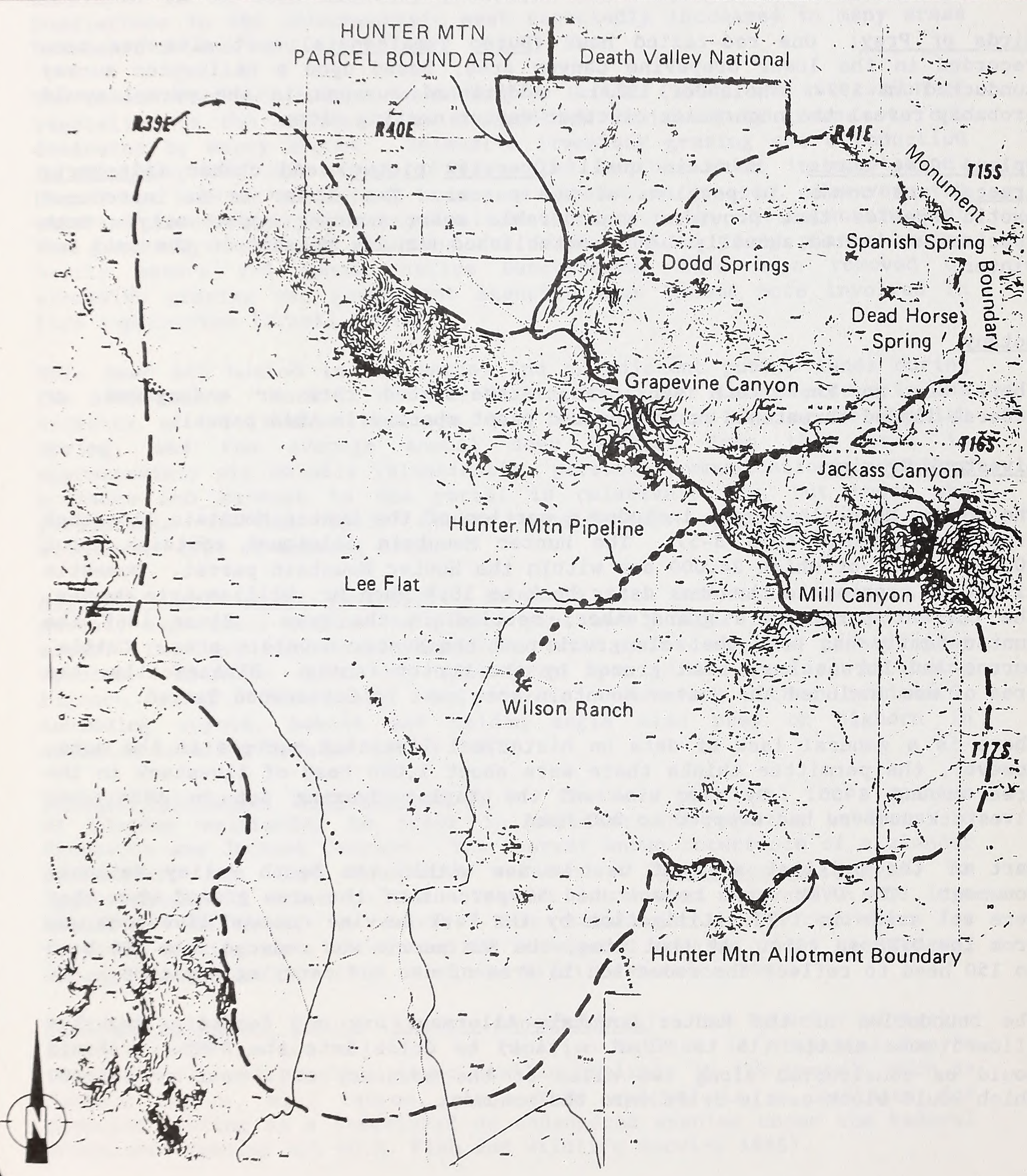
The Hunter Mountain parcel includes a portion of the Hunter Mountain livestock grazing allotment (map 3-5). The Hunter Mountain allotment contains about 60,000 acres, of which 24,000 are within the Hunter Mountain parcel. Domestic livestock grazing in the area dates back to 1868 when Mr. William Lyle Hunter, the current permittee's grandfather, settled in the area. Since 1868 the Hunter family has been the sole grazier of the Hunter Mountain area. Cattle, burros and horses have been grazed by the Hunter family. Historically, the area of use included the Hunter Mountain area east to Cottonwood Canyon.

There is a general lack of data on historical livestock numbers in the area. However, the permittee thinks there were about 1,000 head of livestock in the area around 1900. By the time of the Taylor Grazing Act in 1934, the livestock numbers had dropped to 300 head.

Part of the original area of use is now within the Death Valley National Monument. The DVNM lands constituted 50 percent of the area grazed when they were set aside in 1933. Litigation by the Park Service removed livestock use from the DVNM in 1964. At that time, the BLM permit was reduced from 300 head to 150 head to reflect the reduction in area of use and carrying capacity.

The boundaries of the Hunter Mountain Allotment are not fenced. This has allowed some cattle (15 to 20 at a time) to drift into the DVNM. A fence could be constructed along two miles of the boundary at a cost of $15,000 which would block cattle drift into the monument.

Hunter Mountain Allotment Area MAP 3-5


HUNTER MTN
PARCEL BOUNDARY
Death Valley National
Monument
Boundary
R39E
R40E
R41E
T15S
T16S
T17S
Spanish Spring
Dodd Springs
Dead Horse
Spring
Grapevine Canyon
Jackass Canyon
Hunter Mtn Pipeline
Lee Flat
Mill Canyon
Wilson Ranch
Hunter Mtn Allotment Boundary
N

The CDCA Plan identifies the total forage production for the allotment is 6,644 AUMs. Of this, about 1,500 AUMs are produced on the Hunter Mountain parcel. The current livestock forage allocation for the allotment is 1,105 AUMs. This allocation is for the entire allotment; there is no requirement that a certain portion of this be taken from any one area of the allotment. In other words, the permittee is not restricted as to how much use he can make in the portion of the allotment that is inside the Hunter Mountain parcel. The actual stocking rate for the parcel has varied greatly depending on prevailing weather conditions. The use in the Hunter Mountain parcel has been up to 450 AUMs in recent years.

Monitoring studies have been set up in the Hunter Mountain Allotment. Baseline studies such as exclosures, permanent transects, and photo points were established during 1986 and 1987. Utilization studies were initiated in 1986 and utilization mapping was accomplished in 1987. The utilization studies show less than 20 percent utilization over most of the allotment, including the Hunter Mountain parcel. This utilization level is well within the Desert Plan guidelines, which specify that utilization will not exceed 50 percent.

The condition of the allotment was rated as fair by the CDCA plan. That assessment was made prior to the removal of wild horses and burros from the allotment. At present, there is an upward trend in condition.

In 1898 and 1899, W. L. Hunter, in support of his grazing use, filed claims on the water rights for all springs and streams in the Hunter Mountain Area. A 1967 court decision upheld Mr. Hunter's claim to water rights there. These springs and streams are the only permanent water sources in the Hunter Mountain allotment. All are within the Hunter Mountain parcel (map 3-3). Water is currently piped from a spring development in Jackass Canyon through the Hunter Mountain pipeline to the Wilson Ranch on Lee Flat. This pipeline currently provides the only consistent water source on the Hunter Mountain Allotment outside of the Hunter Mountain parcel. Current plans (in the draft Hunter Mountain Allotment Management Plan) call for further development of this water source and extensions to the pipeline.

A draft allotment management plan (AMP) has been prepared for the Hunter Mountain Allotment. Under the AMP, several changes would be implemented in the Hunter Mountain parcel. These changes would include the following:

1. Changing the season of use on most of the parcel to summer
2. Setting initial stocking rates at 50 head
3. Excluding livestock from parts of lower Grapevine Canyon and Dodd Springs and fencing springs to protect them from cattle use.

The proposed management under the AMP is intended to enhance vegetation condition, reduce conflicts with deer, and exclude livestock from important parts of the bighorn sheep range.

Wild Horse and Burro

Wild horses and burros have accounted for most of the grazing use in the Hunter Mountain area in recent years, and are responsible for a majority of the adverse impacts caused by grazing animals. Capture data is incomplete; however, between 1978 and 1985, about 2,300 burros were removed from the Hunter Mountain grazing allotment. A portion of the burros removed spent at least part of their time in the Hunter Mountain parcel. The exact numbers and the percentage of time spent in the parcel are not available. Best estimates place the use in the allotment prior to burro removal at the equivalent of 1,000 to 1,500 burros on a year-around basis (8,400 to 12,600 AUMs).

Fewer than 15 horses still use the area around Spanish and Dead Horse Springs. About 10 burros still range in lower Grapevine Canyon and around Spanish Spring. Current management goals call for their removal.

The Lee Flat Herd Management Area is adjacent to the Hunter Mountain parcel. The burro use area includes Lee Flat and much of the surrounding area including parts of the Hunter Mountain parcel in upper Grapevine Canyon and Mill Canyon. The Desert Plan prescribes the maintenance of up to 30 head of burros in this herd management area.

Cultural Resources

Ethnographic documentation of the 1930s identifies Hunter Mountain as within one of three divisions of the Saline Valley district of the Western Shoshone. During interviews during the 1970s with Native Americans, contemporary use of Hunter Mountain was described as pinyon collecting and religious observance. The mountain has particular spiritual significance to the Native American community.

Prehistoric and historic cultural resources have been recorded on Hunter Mountain. These include 22 prehistoric sites, four prehistoric isolated artifacts, one historic site, and one site with both prehistoric and historic resources. Additional cultural resource sites are expected since less than 5 percent of the 26,687 acres of land proposed for transfer has been inventoried. All but one of the recorded prehistoric sites includes a lithic scatter, and 10 include no other resources. The remaining sites include flaked stone tools, ground stone artifacts or features, midden, rock shelters, stone alignments, or petroglyphs. One site consists entirely of petroglyphs. Activities represented by these resources include the manufacture of stone tools, processing of edible plants, hunting, and religious practices, with individual sites representing from one to all of these activities. The historic site consists of a variety of metal artifacts and fragments of glass, and suggests a brief camp. The other historic site includes features as well as artifacts associated with on-site residence and the processing of ore in the late-19th or early-20th century. The site also includes stone artifacts and milling features.

Lands

There are no private lands in this parcel. There is a PWR #107. In the southern half of the area is an east-west dirt road which enters the Monument. The road is occasionally maintained by Inyo County and may be claimed under RS 2477.

There are no authorizations of record nor are there any applications or proposals.

The parcel is within the Complex 3 of the R-2508 Military Operations Area. Military aircraft use of the area is authorized above 200 feet above ground level (AGL). A general discussion of the R-2508 area was presented for parcel one.

A four-mile-wide flight corridor (VR 1205/13) centered on Grapevine and Mill Canyons crosses the western edge of the parcel. It is used by formations of planes as well as individual aircraft.

The CDCA Plan designated the area as multiple use class C (proposed wilderness; 23,787 acres) and class L (limited use; 3,090 acres). The multiple use class boundaries are shown on map 3-6. There are no energy production or utility planning corridors in the area. The Inyo County Plan identifies this area as open spaces and multiple use.

Management Presence

BLM's staff visited the parcel relatively infrequently prior to the recent expansion of BLM's ranger force. A ranger was based in Big Pine, and patrolled the parcel once a week. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis: for example, to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. Such visits have averaged about three per month. BLM's resources staffing is also being expanded at the present time.

The recent expansion of BLM's ranger force has changed this situation significantly. A ranger is now posted in Lone Pine. This ranger's patrol sector is smaller than the old Big Pine sector, and the ranger can visit the parcel three times each week.

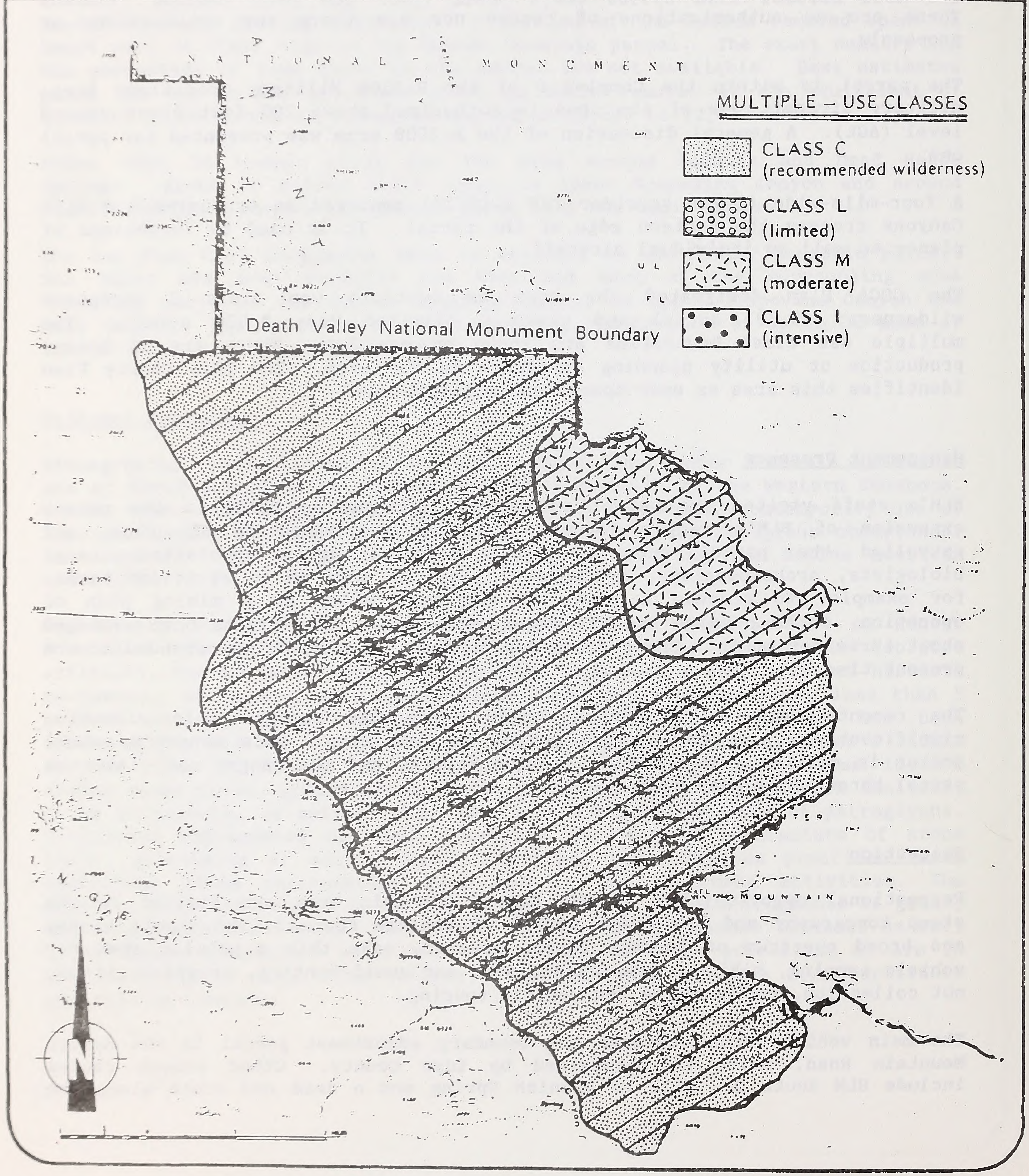
Recreation

Recreational opportunities in the Hunter Mountain area are limited by the steep topography and the small number of vehicle routes. The scenic vistas and broad spectrum of terrain types, however, make this a popular area for vehicle camping, hiking, backpacking, deer and quail hunting, trapping, pinyon nut collection, rockhounding and vehicle touring.

The main vehicle route through the boundary adjustment parcel is the Hunter Mountain Road, which is maintained by Inyo County. Other access routes include BLM Route No. S112 to Spanish Spring and a dead end route along the

HUNTER MOUNTAIN

BLM - CDCA Plan Multiple-Use Class Map MAP 3-6



NATIONAL MONUMENT
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
Death Valley National Monument Boundary
HUNTER
MOUNTAIN
N

BLM-NPS boundary in the northeastern portion of the parcel. A very primitive trail also exists from Saline Valley Road past Dodd Spring to the Lippencott Mine within Death Valley National Monument (currently washed out and only passable for hiking). Several small spur routes to primitive campsites exist off of the Hunter Mountain Road.

There are no open or closed areas within the parcel. All vehicle travel is required to stay on existing routes of travel.

Visitation is estimated at about 2,800 visitor days per year. The parcel is most popular among hunters each fall and also provides an area of higher elevation camping during the extreme temperatures found at the lower elevations of Saline Valley and Death Valley each summer.

Wilderness Study Areas

The parcel is entirely within portions of two BLM WSAs. A description of these WSAs and the BLM recommendations for wilderness suitability are as follows:

1. Hunter Mountain WSA (No. 123). About 80 percent of the WSA (23,787 acres) is within the boundary adjustment parcel. The WSA is bounded by DVNM on the north and east, the Hunter Mountain Road on the south and the Saline Valley Road on the west. Most of the WSA has been preliminarily recommended suitable for wilderness designation (CDCA Plan multiple use class C) due to outstanding natural conditions and opportunities for solitude and primitive and unconfined recreation. A 3,090 acre area around Spanish Spring (accessed by BLM Route No. S112) has been proposed to remain in class L. This area has been impacted by mining operations and a millsite, and is a popular destination for vehicle touring.

2. Panamint Dunes WSA (No. 127). A very small portion of the extreme northern portion of this large WSA is within the boundary adjustment parcel. The 2,900 acres of WSA within the parcel lies south of the Hunter Mountain Road, and has been preliminarily recommended as suitable for wilderness designation (CDCA Plan multiple use class C). The overall diversity of terrain, areas of tall, dense vegetation, outstanding opportunities for solitude and a lack of evidence of the works of man have all been listed as primary reasons for a suitable rating.

Geology-Energy-Minerals

The Hunter Mountain parcel is currently managed under a multiple use concept. Mineral exploration and extraction is governed under the Mining Law of 1872 (and amendments), the Mineral Leasing Act of 1920, the Mineral Materials Act of 1947 (as amended in 1955 by P.L. 167), the Geothermal Steam Act of 1970, the Federal Land and Policy Management Act of 1976 and the Interim Management Policy and Guidelines for Lands Under Wilderness Review. There is no private fee land within the parcel and no split-estate land (public surface, private subsurface). Federal land within the parcel is open to mineral location and entry under the Mining Law of 1872.

Geology

The following geologic description is taken from McKee and others (1984).

The rocks in the study area can be divided into four major groups: (1) Paleozoic marine sedimentary rocks; (2) Jurssic intrusive rocks; (3) upper Tertiary basalt flows; and (4) Quaternary surfical deposits.

The Paleozoic marine sedimentary rocks include strata of Late Cambrian to Mississipian age and have a composite stratigraphic thickness of more than 6,000 feet. At no place within the area, however, is more than a fraction of this thickness exposed. The rocks are predominantly dolomite and limestone with some interbedded quartzite units. In the Hunter Mountain area these carbonate strata have been variously metamorphosed to marble or calc-silicate hormfels and the quartzose units are hormfelsic or phyllitic. A detailed description of the Paleozoic formations is given in McAllister (1956) and Conrad and McKee (1984).

The Jurassic plutonic rocks are part of the Hunter Mountain pluton, a composite granitoid body considered to be comagmatic with the Sierra Nevada batholith (Bateman and others, 1963; McKee and Nash, 1967: Ross, 1969). These granitic rocks intrude and have metamorphosed the Paleozoic sedimentary rocks of the area. The pluton generally has sharp and steep contacts with the surrounding country rock, and contact metamorphic effects extend as far as two miles from the contact. The Hunter Mountain pluton is mostly quartz monzonite in composition, but along border zones it may be composed of monzonite, syenodorite, diorite, and hornblende gabbro, caused by reaction with country rock (Hall, 1971). Locally, small intrusive bodies of aplite, leucogranite, pegmatite, and andesite porphyry cut the Hunter Mountain pluton and older stratified rocks.

A few outcrops of olivine basalt occur in the southern part of the area. These lavas are remnants of flows that have been offset by basin and range faulting and subsequently isolated by erosion. Widespread and voluminous basalt flows comprise most of the Saline Range a few miles north of the parcel and outliers of basalt are found throughout the northern Death Valley region. The basalts are late Miocene and Pliocene in age (Elliot and others, 1984).

Paleozoic strata in the study area are strongly folded and faulted. The intrusion of the Hunter Mountain pluton further complicated the structure by creating widespread, pervasive metamorphic features such as foliation, lineation, and recrystallization. Three major periods of deformation are recognized: (1) faulting and folding that took place prior to emplacement of the granatic rocks. These structures are recognized by regional geologic studies; (2) deformation associated with emplacement of plutonic rocks; and (3) basin and range high-angle normal faulting that is responsible for most of the physiography of the region.

Energy

The parcel has not been classified (USGS, Conservation Division, as amended by BLM, 1985) as prospectively valuable for oil, gas or geothermal resources. However, the BLM Saline Valley Geology-Energy- Mineral Resource Area data

(CDCA Plan, 1980) classified the northern three-fourths of the parcel as having a low potential for the occurrence of uranium and thorium based on geochemical data.

Minerals

Mining History and Exploration: The past mining history and production of the parcel are described in Causey and others (1983) and by McAllister (1955). In summary, the Ubehebe district (gold, lead, zinc, copper, tungsten, silver, wollastonite) includes the parcel and extends north about 10 miles. Recorded production of 5,625,501 pounds of lead, 347,649 pounds of zinc, 31,880 pounds of copper, 84,837 troy ounces silver and 303.4 troy ounces of gold is from four mines that are now within the borders of Death Valley National Monument (U.S. Bureau of Mines production records).

The Lippincott Mine, which adjoins the parcel, was one of the major lead-silver-zinc producers. McAllister (1955) states that the early history of prospecting and mineral development in the Lippincott area is obscure because the names of mining properties have been changed several times, recorded descriptions of the locations are vague and no claim notices dated prior to 1934 were seen at the claim monuments.

Leases and Mining Claims: A review of the BLM mining claim records (April 12, 1988 version) documents the existence of 25 unpatented lode claims, 36 association (160 acre) placer claims and 2 millsites. The majority of the lode claims are concentrated in the northeastern part of the parcel. The placer claims are grouped into two major concentrations in the eastern and south central part of the parcel.

Mineral Potential Overview: Mines and prospects within and adjacent to the parcel have produced gold, silver, lead, zinc, copper and wollastonite. A mineral potential map (map 3-7) shows areas of mineral potential and defines the high and moderate potential classifications.

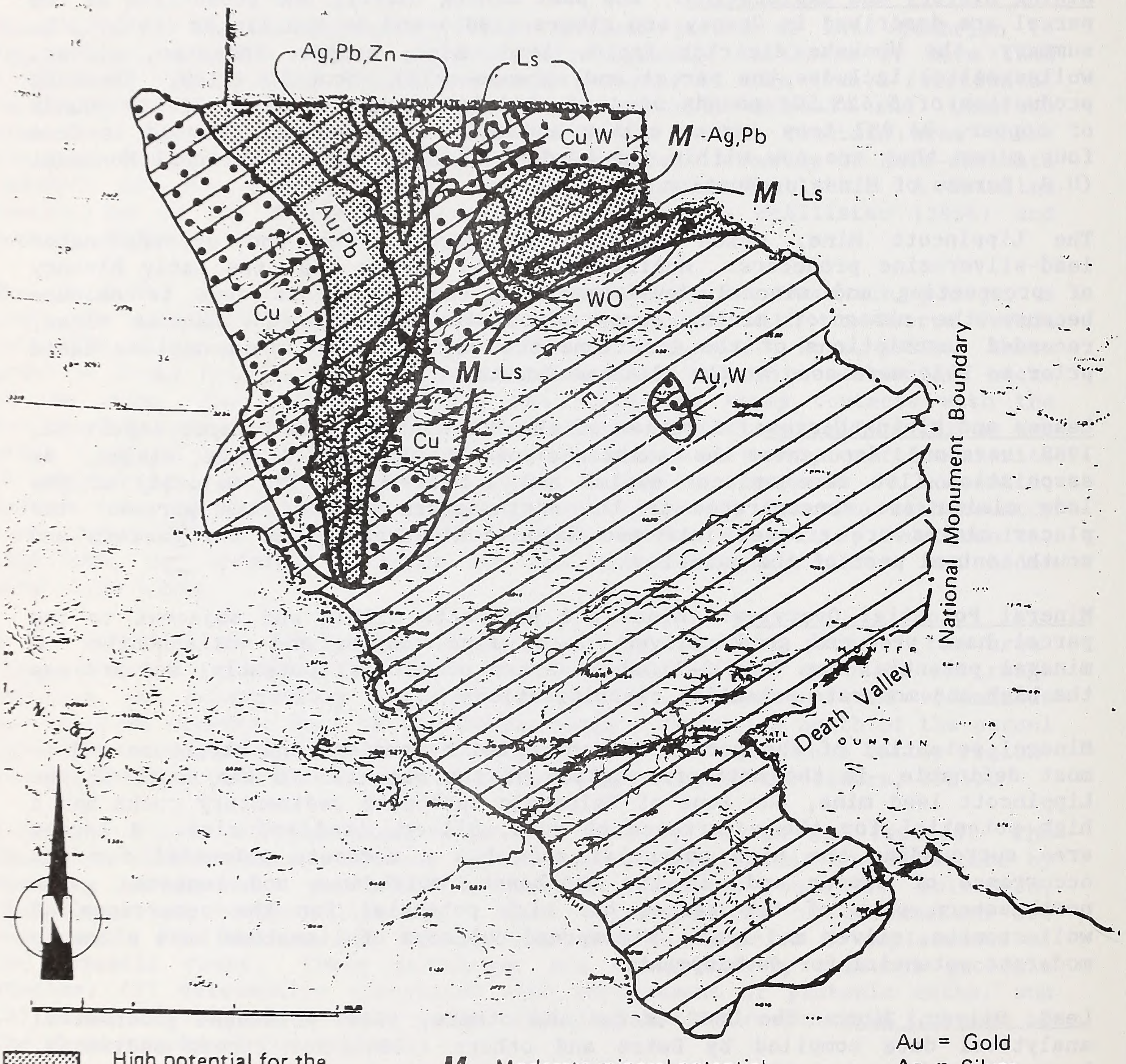
Mineral potential of the parcel is controlled by geology and structure and is most definable in the northern portion of the parcel. To the south of the Lippincott lead mine, the zone of Paleozoic carbonate sedimentary rocks has a high potential for the occurrence of gold, silver, lead and zinc. A larger area surrounding the high potential zone has a moderate potential for the occurrence of copper and, in the northeast, molybdenum and tungsten. The northeastern part of the parcel has high potential for the occurrence of wollastonite, silver and lead. Widespread outcrops of limestone have a low to moderate potential for development.

Lead, Silver, Zinc: The USGS (McKee and others, 1984) presented geochemical analytical data compiled by Detra and others (1984) for stream sediments, heavy mineral concentrates from stream sediments and rock chip samples.

The mineralization detected by evaluation of the trace elements is mostly related to lead-silver-zinc hydrothermal processes. The geologic setting and the presence of certain heavy minerals in concentrates suggest that mineralized skarns may be present as well (McKee, 1984).

Hunter Mountain

Mineral Resources Potential MAP 3-7



Ag,Pb,Zn
Ls
Cu,W
M -Ag,Pb
M -Ls
Au,Pb
Cu
WO
M -Ls
Au,W
Cu
National Monument Boundary
Death Valley
N

▒ High potential for the Occurrence of energy and/or non-energy minerals

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals

M Moderate mineral potential location in a High mineral potential area

H High mineral potential location in a Moderate mineral potential area

Au = Gold
Ag = Silver
Cu = Copper
Pb = Lead
Zn = Zinc
W = Tungsten
Ls = Limestone
WO = Wollastonite

The area to the immediate south of the Lippencott lead mine is classified as having a high potential for lead, silver, and zinc. A smaller area in the northeastern part of the parcel is classified as having a moderate potential for silver and lead (Taylor and Joseph, 1987). Taylor and Joseph also assigned a high potential classification for gold and lead to the band of Paleozoic sediments in the west-central part of the parcel.

Copper: McAllister (1955) noted that copper was the first metal in the region to attract the general attention of prospectors and miners near the turn of the 19th century. McAllister also describes most ot the copper deposits as small, associated with contact-metamorphic zones and containing very high grade ore.

The contact zones and surrounding intrusive rocks near the carbonate sedimentary sequences are classified as having a moderate potential for the occurrence of copper.

Tungsten: McAllister (1955) speculated on the outlook for future mineral deposits within the Ubehebe Peak quadrangle. McAllsiter states, "Tactite, which is favorable for the occurrence of scheelite (tungsten ore)... occurs widely in the Ubehebe Peak quadrangle, and moderately widespread traces of scheelite indicate that at least some tungsten here was in the mineralizers." The USGS (1984) classified the northeastern part of the parcel as having a low potential for the occurrence of tungsten, molybdenum, copper and silver in skarn and vein deposits. The USGS classification was upgraded to a moderate potential based on information and data supplied by the State of California, Division of Mines and Geology in 1985.

Wollastonite: The following status report of wollastonite is summarized from Clark (1980). "Wollastonite is a common mineral found in assemblages of moderately metamorphosed, lime-rich rocks. Although wollastonite itself is not rare, its occurrence in relatively large, pure masses is very unusual. According to available literature, only a few rich deposits are known throughout the world. Production of commercial grade material has been developed from ore bodies near ... the Hunter Mountain area...".

Clark states that upwards to 200 million tons or more for the entire wollastonite rock mass is inferred from surface exposures. Specific estimates (based on surface exposures) of the west end resource range upward to 25 million ton of 65 to 85 percent pure wollastonite.

A confidential report prepared by Moore and Tabor (1985) presented an analysis of the J.O. property located in the parcel. Total volume of all categories (measured, indicated and inferred) of reserves was estimated to be 18,000,000 tons (or more) of ore containing an average of 60 percent wollastonite. In 1985, 43 exploration holes were drilled on the J.O. property by Nor Con Industries. The data has not been released to the public.

Interspace Corporation, the principal producer of Wollastonite in the United States, may mine this deposit in the future since current deposits in New York state are being depleted (California Division of Mines and Geology (CDMG), 1985).

Limestone: Carbonate rock is present in small (less than several thousand feet long) to large (more than several miles long) masses consisting of limestone, dolomite and marble of various composition. Only minor historic prodiction has been recorded within the parcel area; however, age- and composition-equivalent rocks have been extensively mined elsewhere in the desert region. These units could represent important resources of carbonate rock suitable for a number of industrial uses (Taylor and Joseph, 1987). Based on a developmental likelihood, the parcel has a low to moderate potential for the occurrence of limestone deposits.

PARCEL THREE: PYRAMID PEAK

Wildlife

Wildlife habitat throughout the area is predominantly a creosotebush scrub composed mainly of shrubs. The major dominant species of this vegetation is creosotebush (Larrea tridentata). Dominance is often shared with burrobush (Ambrosia dumosa) and occasionally with cheesebush (Hymenoclea salsola), brittlebush (Encelia farinosa) and saltbush (Atriplex sp.). Grasses may be present but generally comprise a very small percentage of vegetation components.

The broad dry valleys, rugged rocky mountains, and sandy washes support a wide variety of wildlife species. Common reptiles in the area include side-blotched lizards, whiptails, zebra-tailed lizards, spiny lizards, gopher snakes, speckled rattlesnakes, and sidewinder rattlesnakes. Indigenous mammals include antelope ground squirrel, Merriam's kangaroo rat, desert wood rat, coyote, kit fox, badger, and black-tailed jack rabbit. Although hundreds of species of birds may utilize various habitats at some time during the year, those most often observed include mourning dove, horned lark, house finch, black-throated sparrow, turkey vulture, red-tailed hawk, road runner, loggerhead shrike, and common raven. While the sensitive Amargosa River pupfish and Nevada speckled dace inhabit the Amargosa River, it is not believed that flows in the parcel are sufficient to support these fish species.

Although there are doubtless golden eagle, prairie falcon, and other raptor nests and aeries throughout the region, none are documented in the project area.

The springs identified under "water" are not documented as to quantity or reliability as water sources. Nonetheless, any water source in the desert must be considered extremely important to wildlife, even if it is only intermittent.

Significant Species

There are no documented federally listed threatened or endangered wildlife species in this area.

Desert Bighorn: In the Funeral Mountains, which include Pyramid Peak, the BLM currently manages about 12 percent of the bighorn sheep habitat and Death Valley National Monument manages 85 percent of the bighorn habitat (Cooperrider, 1988). The remaining three percent of the habitat is private and state owned property. A bighorn guzzler has been built one mile NE of Pyramid Peak in a cooperative effort between the BLM and the California Department of Fish and Game (CDFG) (BLM, 1986). This guzzler is currently receiving low use. The bighorn populations in the Funeral Mountains have steadily declined from 145 bighorn in 1961 (Wells, R.E. and F.B. 1961) to 60 bighorn in 1972 (Weaver, R. 1972), and to the current (1987) estimate of 35 bighorn (Weaver, R. 1987). These declines parallel bighorn populations declines in DVNM as a whole, those being 900 bighorn in 1961 (Wells, R.E. and F.B. 1961), 600 bighorn in 1972 (Weaver, R.A. 1972), and 404 bighorn in 1987 (Weaver, R.A. 1987). The trend can be expected to continue. Virtually all of the land in the parcel is permanent bighorn range.

Botany

The Pyramid Peak parcel contains no known state or federally listed plants or their defined critical habitat, nor is it known to have present any candidate or BLM sensitive plant species. To the southwest of the parcel within DVNM are three species that have the potential of occurring within the Pyramid Peak parcel. These are desert bear-poppy (Arctomecon merriamii), Hoffman's robust buckwheat (Eriogonum hoffmannii var. robustius), and Death Valley sandpaper plant (Petalonyx thurberi ssp. gilmanii). Both the desert bear poppy and Hoffman's robust buckwheet are Category 3c on the U.S. Fish and Wildlife Service list of plant taxa under review for listing. Category 3c indicates that the species is more abundant or widespread than previously thought or not subject to any identifiable threat.

The Death Valley Sandpaper plant is a Category 2 plant on the U.S. Fish and Wildlife Service list. Category 2 plants are those that are appropriate to propose for listing as threatened or endangered, but substantial data is needed to support listing. Of the three species only the Death Valley Sandpaper plant appears on the California BLM State Director's list of sensitive plants.

No other unique or unusual botanical resources are known to occur in this area.

Livestock Grazing

The CDCA Plan did not designate Livestock Grazing Allotments in this area.

Wild Horse and Burro

The CDCA Plan did not designate herd management areas for wild horses or burros in this area.

Cultural Resources

Less than 1 percent of the Pyramid Peak and Greenwater Valley parcels have been inventoried for cultural resources (BLM 1980). Thus, the specific data presented below is incomplete. It is also impossible with the existing data to statistically estimate archaeological site density and distribution within the parcels. However, the following generalizations are valid for this area (BLM 1979; 1980).

1. Prehistoric archaeological sites will be found in association with water sources. Areas within 1/2 mile of springs and seeps will have a high probability of containing habitation, hunting, and plant processing sites;

2. Prehistoric archaeological sites will be found on desert pavement surfaces. These sites will include lithic scatters, rock rings, sleeping circles, and geoglyphs. Sites in desert pavements will be examples of the earliest sites in the desert.

3. Prehistoric archaeological sites will be found in areas characterized by cryptocrystalline source rocks suitable for lithic tool manufacture. These sites will tend to be quarry sites and large primary reduction lithic scatters.

4. Prehistoric rock art sites will be found in dark basaltic cliff faces and boulder fields, especially at the entrances to passes through mountain ranges separating major valleys.

5. Areas not characterized above, especially large alluvial fans without desert pavement or lithic source materials, will have very low site densities.

Parcel-Specific Information

Archaeological resources are threatened by natural erosional and depositional processes and by surface-disturbing human activities. In the Pyramid Peak parcel these activities include limited off-highway vehicle free-play in the Red Amphitheater area and in the extreme southeastern corner of the parcel (near State highway 190), non-motorized recreation, and occasional mining and illicit collecting.

There are two prehistoric archaeological sites recorded within parcel three. CA-INY-2355 consists of a rockshelter in volcanic breccia, within the Red Amphitheater area. In 1977 the shelter was recorded as containing grinding tools, obsidian and chert lithic debris, and burnt bone. The presence of burnt bone suggests the possibility of a midden deposit in the shelter. There are numerous similar rock grottos in this area and thus a high probability of finding numerous similar sites. The second site, CA-INY-1533, was recorded in 1966 as consisting of 7 house pits with associated lithic debris and crude chopper tools.

Neither of these sites has been relocated since recordation and their current status is unknown.

Lands

Of the 14,268 total acres, about 90 percent (12,844 acres) are public lands administered by BLM. About 1184 acres (8.3 percent) are owned by the State of California, and 240 acres (1.7 percent) are privately owned.

The south parcel boundary is formed by State Highway 190, a 400 foot wide right-of-way authorized on April 25, 1940 by Grant S-031950 pursuant to the Federal Highway act of November 9, 1921. There are no other interior rights-of-way or other surface authorizations. There are no claimed or maintained Inyo County roads within the Pyramid Peak Parcel.

There is one pending actions that involve lands within the parcel:

> In June 1987, U.S. Borax submitted a land exchange proposal to BLM/NPS, wherein the surface estate of certain lands within Death Valley National Monument would be deeded to the United States in exchange for the surface estate of public lands in the Ryan area. A component of the overall proposal is to relocate, by exchange, the U.S. Borax Travertine Point patented lands one mile to the south, their originally intended position per the 1857 survey.

The CDCA Plan designated public lands in the Pyramid Peak parcel as multiple use class C (proposed wilderness; 11,956 acres) and class M (moderate use; 2,312 acres)(see map 3-8). The Conservation and Open Space Elements of the Inyo County General Plan identify "Natural Resource Lands" to encourage the wise utilization of natural resources and still promote conservation and protection of environmental resources. This classification is intended to be generally consistent with the CDCA Plan's multiple-use class M designation.

There are no energy production and utility planning corridors in the area.

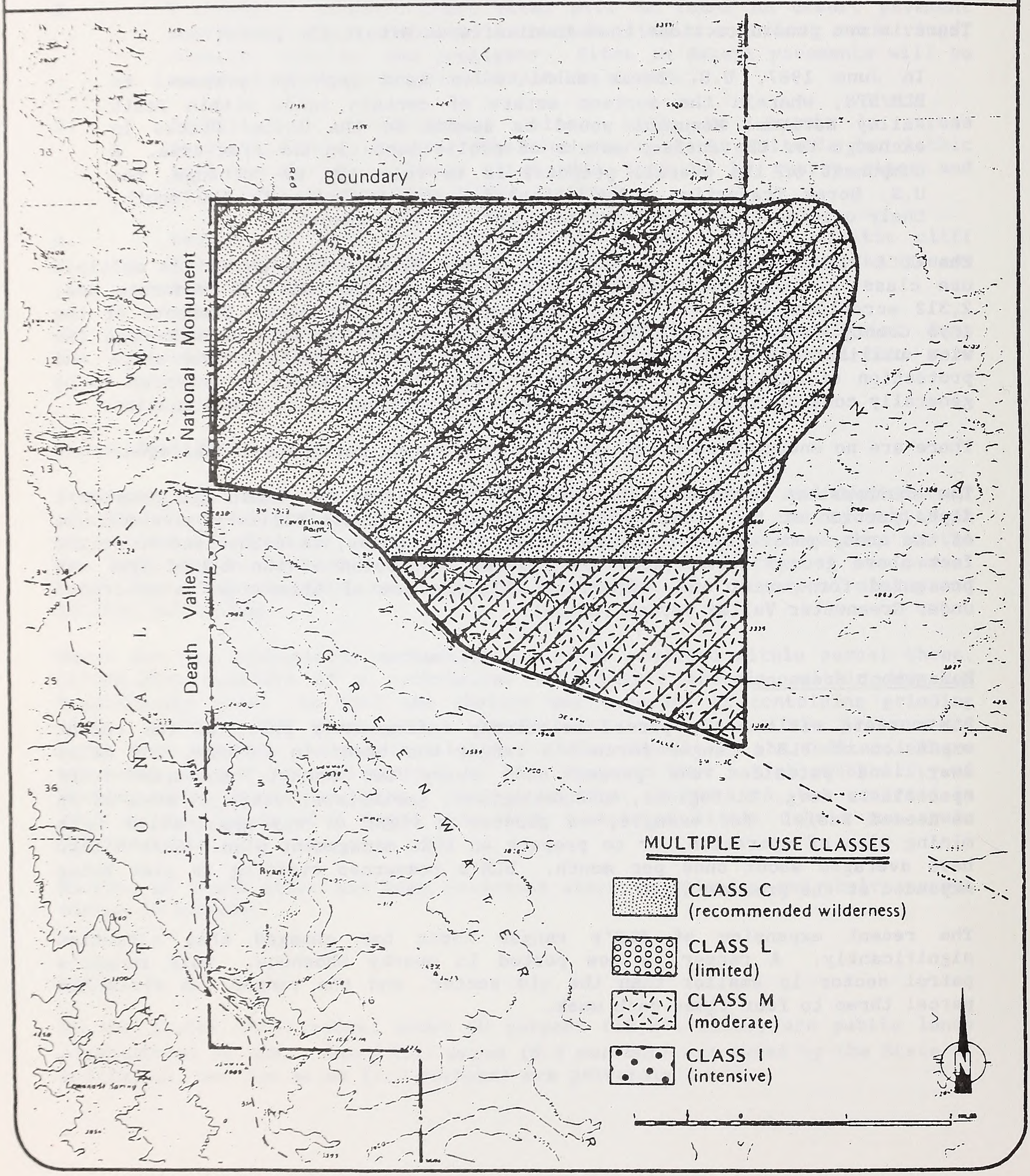
The southwestern portion of the Pyramid Peak parcel is within the Complex 4 Alpha portion of the R-2508 Military Operations Area. Military aircraft use of the area, generally not on prescribed flight paths, is authorized above 200 feet above ground level (AGL). A general discussion of the R-2508 area was presented for parcel one. Specific military use of this area is described under Greenwater Valley parcel (below).

Management Presence

BLM's staff visited the parcel relatively infrequently prior to the recent expansion of BLM's ranger force. A ranger was based in Barstow, 200 miles away, and patrolled the parcel once every two weeks. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis: for example, to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. Such visits have averaged about once per month. BLM's resources staffing is also being expanded at the present time.

The recent expansion of BLM's ranger force has changed this situation significantly. A ranger is now posted in nearby Shoshone. This ranger's patrol sector is smaller than the old sector, and the ranger can visit the parcel three to four times each week.

PYRAMID PEAK
BLM - CDCA Plan Multiple-Use Class Map MAP 3-8


Boundary
Death Valley National Monument
Travertine Point
Ryan
Lemonade Spring
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N

Wilderness

The parcel is entirely within the Funeral Mountains Wilderness Study Area. About 84 percent of the parcel, 11,956 acres, is recommended as suitable for wilderness designation by BLM. This area contains exemplary landscapes, including the rugged and colorful banding of dolomite and limestone rock along the southern extension of the Funeral Mountains, the picturesque Pyramid Peak which rises to nearly 7,000 feet, and the geologically-enclosed colorful valley called Red Amphitheater. Man-made intrusions have been excluded, leaving pristine rugged canyons and craggy peaks. Due to the ruggedness and complexity of the canyons and peaks, outstanding opportunities for solitude are available. The terrain lends itself to unique opportunities for primitive and unconfined types of recreation, including backpacking, mountain and rock climbing, day hiking, and nature studies. Additional opportunities for extended desert backpacking experiences are afforded by the contiguous administratively endorsed wilderness in Death Valley National Monument.

The 2,312 acres that are recommended as non-suitable include a bajada along the southern slope of Pyramid Peak. This area contains high mineral potential for sand and gravel and medium potential for borates.

Recreation

The Pyramid Peak parcel primarily serves as a spectacular scenic backdrop to motorists entering Death Valley National Monument via State Route 190. The precipitous terrain of most portions of the parcel virtually excludes those types of vehicle dependent recreation activities. The only route of travel within this parcel is a one-mile segment in the drainage of Red Amphitheater. Although potentials are good for primitive types of recreation, existing use levels are low. Desert hikers consider the ascent of Pyramid Peak a considerable challenge. The long-term potential for recreational hunting of trophy desert bighorn sheep in the area is good.

Geology - Energy - Minerals

Energy

The parcel has low potential for the occurrence of geothermal, oil and gas, and sodium resources.

Minerals

Mining History and Exploration: Bentonite was prospected at an unknown time on a placer claim in the eastern part of the parcel (SE1/4 Sec. 18, T.26N., R.4E.). No plans of operations for exploration or mining have been received for this parcel since regulations were issued in 1980. The parcel is open to mineral entry except for about 1,180 acres of State land and about 240 acres of private lands.

Leases and Mining Claims: There are no mineral leases on parcel three. There is one unpatented mining claim and one mill site claim in the study area. These are located in the eastern portion of the parcel. A 160-acre patented mining claim is located in the western part of the area. There is no recorded mineral production from this property, which is owned by U.S. Borax.

Mineral Potential Overview: Most of parcel three has moderate to high potential for the occurrence of mineral resources (see map 3-9).

Sand and Gravel: About $2^1/_2$ square miles in the southern part of the parcel have high potential for the occurrence of sand and gravel. This is based on the similarity of these deposits to a past extraction site $5^1/_2$ miles to the southeast where Caltrans has removed about 30,000 cubic yards of aggregate for the maintenance of Highway 190.

Bentonite and Zeolite: About $1^2/_3$ square miles in the northeast part of the parcel has moderate potential for the occurrence of clay (bentonite) and zeolite. This area is underlain by Tertiary-age tuffaceous sedimentary rocks which contain concentrations of bentonitic clay and minor zeolites. Currently, bentonite is being produced at the Sidehill Mine, five miles to the east (Taylor, 1986, p. 32).

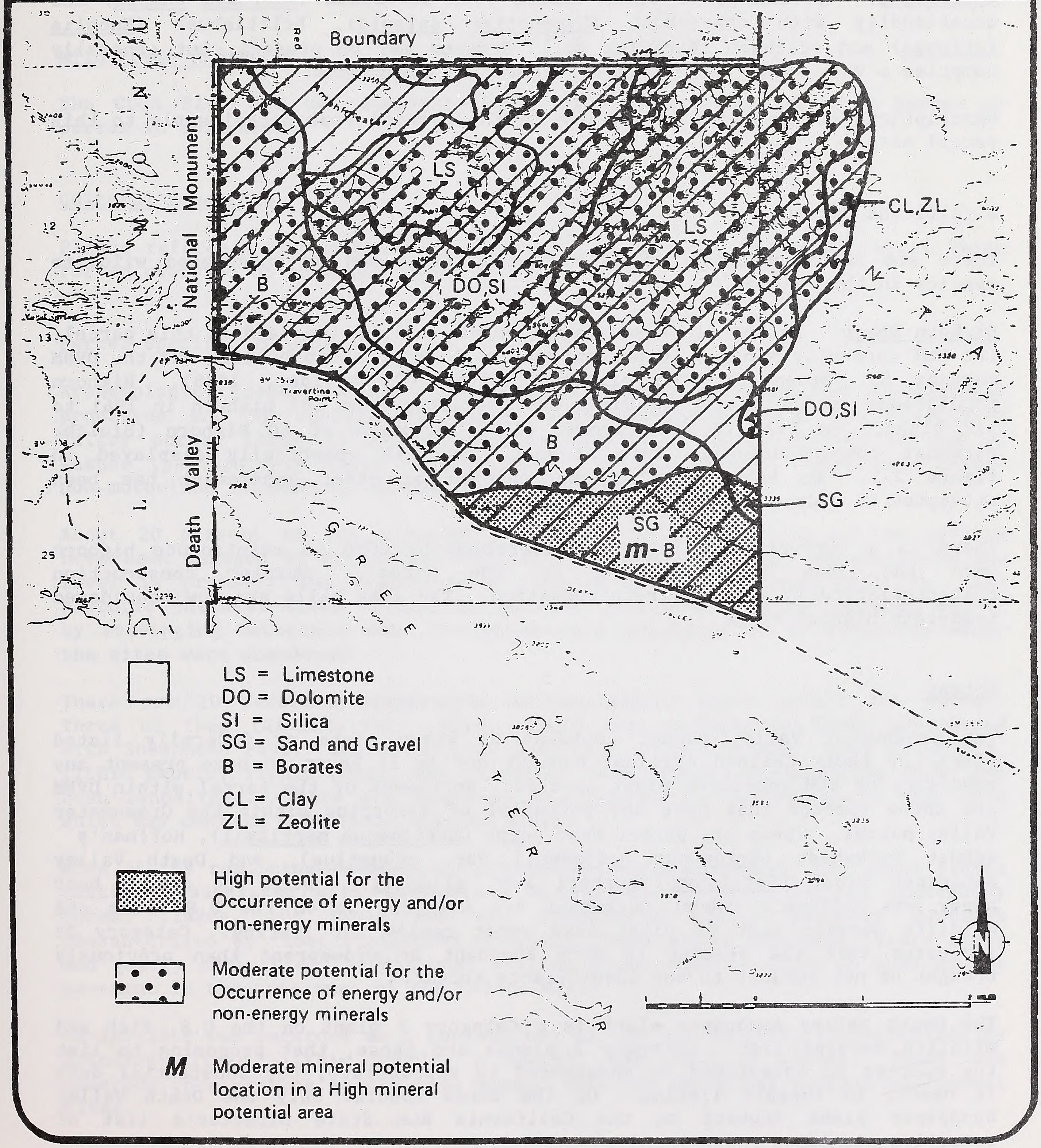
Limestone: About eight square miles in the northern and north-central part of Parcel Three has moderate potential for the occurrence of limestone. These areas contain carbonate rock that is predominantly limestone of Devonian to Mesozoic age. Although there has been no production from this area, these formations or similar-age formations have recorded production elsewhere in the Mojave Desert and, as a consequence, could contain important resources of carbonate rock (Taylor, 1986, p. 33).

Dolomite and Silica: About $4^1/_2$ square miles in the central to north-central part of the parcel have moderate potential for the occurrence of dolomite and silica (quartzite). This area contains carbonate rock that is predominantly dolomite of Precambrian to Silurian age. Carbonate rocks of equivalent ages have produced dolomite in other areas of California and, as a consequence, this area could contain resources (Taylor, 1986, p. 33) as shown in California Division of Mines and Geology Bulletin 194 (Bowen, et al., 1973).

Boron (Borates): About three square miles in the western and southern part of the parcel have moderate potential for the occurrence of borate. This area is within a broad zone which encompasses several areas known to contain identified borate reserves, and represents a synthesis of both published and proprietary company data regarding the delineation of a zone deemed to be favorable for borate mineralization (Taylor, 1986, p. 34). The U.S. Geological Survey has classified this area as having moderate potential for the occurrence of borate resources since undiscovered deposits of considerable size may be present in this area (Armstrong, et al., 1987, p. A9).

Pyramid Peak

Mineral Resources Potential MAP 3-9


Boundary
Red
Amphitheater
Death Valley National Monument
LS
LS
DO,SI
B
B
CL,ZL
DO,SI
SG
SG
m-B
Travertine Point
LS = Limestone
DO = Dolomite
SI = Silica
SG = Sand and Gravel
B = Borates
CL = Clay
ZL = Zeolite
High potential for the Occurrence of energy and/or non-energy minerals
Moderate potential for the Occurrence of energy and/or non-energy minerals
M Moderate mineral potential location in a High mineral potential area
N

Wildlife

Wildlife habitat is predominantly a creosotebush scrub composed mainly of shrubs. The major dominant species of this vegetation is creosotebush (Larrea tridentata). Dominance is often shared with burrobush (Ambrosia dumosa) and occasionally with cheesebush (Hymenoclea salsola), brittlebush (Encelia farinosa) and saltbush (Atriplex sp.) Grasses may be present, but generally comprise a very small percentage of vegetation components.

Descriptions of general wildlife use in the Pyramid Peak parcel apply to this parcel also.

Significant Species

There are no documented federally listed threatened or endangered wildlife species in this parcel.

Bighorn Sheep: In the Black Mountains, a sub-unit of the land in this parcel, the BLM currently manages 10 percent of the bighorn sheep habitat and the DVNM manages 85 percent of the bighorn habitat (Cooperrider, 1988). Bighorn populations in the Black Mountains have declined from 163 bighorn in 1961 to 110 bighorn in 1972 to the current (1987) estimate of 60 bighorn (Bleich, personal communication). This 26-year trend is graphically displayed in figure 3-1. No known guzzler construction or other management has been attempted to reduce or halt this decline.

There is a current long range consideration by CDFG to reintroduce bighorn into the Ibex Hills portion of the parcel. Guzzler construction characteristically precedes reintroduction. The Ibex hills are now considered transient bighorn range.

Botany

The Greenwater Valley parcel contains no known state or federally listed plants or their defined critical habitat nor is it known to have present any candidate or BLM sensitive plant species. Northwest of the parcel within DVNM are three species that have the potential of occurring within the Greenwater Valley parcel. These are desert bear-poppy (Arctomecon merriamii), Hoffman's robust buckwheat (Eriogonum hoffmannii var. robustius), and Death Valley sandpaper plant (Petalonyx thurberi ssp. gilmanii). Both the desert bear poppy and Hoffman's robust buckwheat are Category 3c on the U.S. Fish and Wildlife Service list of plant taxa under review for listing. Category 3c indicates that the species is more abundant or widespread than previously thought or not subject to any identifiable threat.

The Death Valley sandpaper plant is a Category 2 plant on the U.S. Fish and Wildlife Service list. Category 2 plants are those, that proposing to list the species as threatened or endangered is appropriate, but substantial data is needed to support listing. Of the three species only the Death Valley Sandpaper plant appears on the California BLM State Director's list of sensitive plants.

No other unique or unusual botanical resources are known to occur in this area.

Livestock Grazing

The CDCA Plan did not designate Livestock Grazing Allotments in this area.

Wild Horse and Burro

The CDCA Plan did not designate herd management areas for wild horses or burros in this area.

Cultural Resources

Please reference the cultural resource portion of Alternative A: Parcel Three for an overview of cultural resources.

Parcel Specific Information

Archaeological resources are threatened by natural erosional and depositional processes and by surface-disturbing human activities. In the Greenwater Valley parcel these activities include limited off-highway vehicle use of washes (particularly those running west from the Furnace Creek Wash Road), non-motorized recreation, mining, and occasional vandalism.

About 20 percent of the recorded prehistoric cultural sites in the parcels have been damaged by either OHV traffic or vandalism. This comparatively low level is probably the result of a lack of intensive human activity. All historic cultural sites within the parcels have been heavily damaged, either by scavenging materials when the sites were abandoned or by vandalism after the sites were abandoned.

There are 10 recorded prehistoric archaeological sites within the parcel. Three of them (CA-INY-1813, -1814, -1815) are rockshelter areas associated with Sheephead Pass. These shelters generally contain ground stone artifacts, lithic debris, lithic tools, and ceramics. One shelter complex (INY-1815) had been vandalized. There are numerous rock grottos in the Sheephead Pass area which may contain additional similar sites.

Five of the remaining seven sites (CA-INY-2361 through -2365) are small lithic scatters associated with the Calico Hills. These sites contain chalcedony cores, flakes, and tools and are located on desert pavement surfaces characterized by float chalcedony nodules. These sites represent lithic assay and quarry activities. Additional similar sites will be found on most desert pavement in the area east of the Calico Hills.

CA-INY-2368 was recorded as a rockshelter in the Calico Hills characterized by grinding slicks, lithic debris, a hearth, and possible midden. There are numerous rock grottos in the area around INY-2368 which may contain additional sites.

The final site (CA-INY-2372) is recorded as a geoglyph on a desert pavement surface on the floor of Greenwater Canyon. The geoglyph consists of a series of straight and wavy lines and a zoomorph. The designs have been disturbed by OHV activity.

Historic cultural resources in the parcel are associated with mining activities from the early 1900s (Chalfant 1933). The most famous of these sites is the Greenwater Mining District (Vredenburgh, et. al. 1981). In late 1904, the discovery of apparently rich copper deposits near Greenwater Spring sparked one of the most intensive mining speculation booms in the history of western mining (Paher 1973). During the 4 year boom, 2,500 claims were filed and shafts up to 1,400 feet deep were dug. The town of Greenwater contained at least 1,000 people who enjoyed telephone service, a bank, post office and two newspapers. By the time the boom collapsed, $140,000,000 worth of mining stock had been sold to the public. Unfortunately all of this intense activity resulted in only 20 tons of copper shipped from Greenwater (Armstrong, et. al. 1987; Taylor 1986).

When Greenwater was abandoned in late 1907, its buildings were dismantled and shipped to other boomtowns (Paher 1973). Since then this site has been virtually destroyed by vandalism and almost nothing remains today, except a moonscape of illegal excavations. Most of the historic properties in the Greenwater Mining District located within the monument and the remainder of the District are shafts, adits, and tailing piles located between the monument boundary and the Greenwater site.

Lands

Over 95 percent of the total acreage is public lands administered by BLM. About 5,100 acres (4.3 percent) are owned by the State of California. These are the Section 16 and 36 grants in each township. Mineral entry patents, conveyed between 1896 and 1926, account for the approximately 500 acres (0.4 percent) in private ownership. About 380 acres of contiguous private holdings are located in the northern portion of this parcel (Sections 27, 34 and 35, T.24N., R.3E., SBM). The remaining private acreage consists of three isolated patented claims in the southern area.

Within the parcel is a PWR 13. PWR are withdrawn from agricultural settlement and entry and from non-metalliferous mineral entry. The lands are open to mineral leasing, mineral material sales and metalliferous mineral entry. A withdrawal review field report, under Section 204 FLPMA, recommends revocation of the PWR withdrawal because there is no surface water.

Most of the eastern parcel boundary is formed by the Furnace Creek Wash Road (Inyo County Road No. 5005). A five mile southeast boundary segment is State Highway 127. These public roadways, as well as the interior roads described below, were established by use and/or construction under the principles of Revised Statue 2477 (formerly 43 U.S.C. 932). Generally, the right-of-way width is the width under State law at the time of road establishment, or the maintained roadway width. Public roadways in the interior of the parcel (map 2-4) include State Highway 178 and the "Lost Section Road" and connector (Inyo County Roads 5010 and 5010A).

Other interior surface rights of record, concentrated in the parcel's southeast area, are identified below:

> Material Site rights-of-way LA-0164240 (November 24, 1959) and R-1483 (April 17, 1967) within Section 28, T.20N., R.6E., SBM; authorized pursuant to the Act of August 27, 1958 (23 U.S.C. 317); no expiration date.
>
> Electric distribution pole line rights-of-way R-01247 (June 9, 1965) and R-316 (March 16, 1967) to the Eclipse Mine within Sections 7 and 18, T.20N., R.6E., SBM; authorized pursuant to the Act of March 4, 1911, as amended (43 U.S.C. 961); 50 year grant terms renewable.
>
> Electric distribution pole line right-of-way R-06979 (November 17, 1966) which roughly parallels the west side of State Highway 127; authorized pursuant to the Act of March 4, 1911, as amended.

Section 36, T.22$^1/_2$N., R.4E., SBM was involved in BLM-State of California land exchange CA-15867 (September 9, 1984). As part of 51,909 acres of offered lands, the State of California conveyed this unsurveyed section (part of the State's land entitlement as a condition of Statehood) to the United States. There are no pending lands actions.

The Greenwater Valley parcel is entirely within the Complex 4 Alpha portion of the R-2508 Military Operations Area. Military aircraft use of the area, generally not on prescribed flight paths, is authorized above 200 feet AGL. A general discussion of the R-2508 area was presented for parcel one.

No low-level routes cross the area. However, it is extensively used as a maneuver and training area, particularly by George Air Force Base. That base typically conducts 35 to 50 sorties per day in the area, most at elevations of about 500 feet AGL. It is also used by Marine Corps KC130's at 1,500 feet AGL on their way to the Nellis Range Complex.

The CDCA Plan designated the area as multiple use class C (proposed wilderness; 23,440 acres), class L (limited use; 39,691 acres), class M (34,728 acres) and class I (intensive use; 19,646 acres)(see map 3-10). The Inyo County General Plan classified the parcel as "Natural Resource Lands", a classification intended to be generally consistent with the CDCA Plan's multiple-use class M. There are no energy production and utility corridors in the area.

Management Presence

BLM's staff visited the parcel relatively infrequently prior to the recent expansion of BLM's ranger force. A ranger was based in Barstow, 200 miles away, and patrolled the parcel once every two weeks. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis: for example, to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. Such visits have averaged about once per month. BLM's resources staffing is also being expanded at the present time.

The recent expansion of BLM's ranger force has changed this situation significantly. A ranger is now posted in nearby Shoshone. This ranger's patrol sector is smaller than the old sector, and the ranger can visit the parcel three to four times each week.

Wilderness

About 85 percent of the parcel is located within the Greenwater Valley and Ibex Hills WSAs. Greenwater Valley WSA is located north of State Route 178 and its boundaries are identical to the portion of Parcel Four that is north of State Route 178. The Ibex Hills WSA is located south of State Route 178, and is partly within the parcel. The remaining 15 percent of the parcel was eliminated from wilderness study by BLM because of existing impacts to naturalness.

BLM has recommended 23,440 acres (20 percent) of the parcel as suitable for wilderness designation. This area is located in the south-central portion of the parcel, within the Greenwater Valley WSA. It posseses an outstanding wilderness character that exemplifies the criteria stated in Section 2(c) of the Wilderness Act of 1964.

The 1980 CDCA Plan originally recommended 52,810 acres of parcel four (Greenwater Valley WSA) as suitable for wilderness designation. However, in 1982, Inyo County Board of Supervisors submitted a proposal to amend the CDCA Plan and reduce the suitable portion to 23,440 acres. The amendment was approved. A county claimed road had inadvertently been included within the area originally recommended as suitable for wilderness.

The entire Ibex Hills WSA (located south of State Route 178) was recommended nonsuitable for wilderness designation in the 1980 CDCA Plan because of high mineral potential and existing impacts to naturalness. Several past producing mines are located within the WSA.

Upon release from wilderness consideration, the nonsuitable portions of both WSAs will be managed for multiple uses other than wilderness.

Recreation

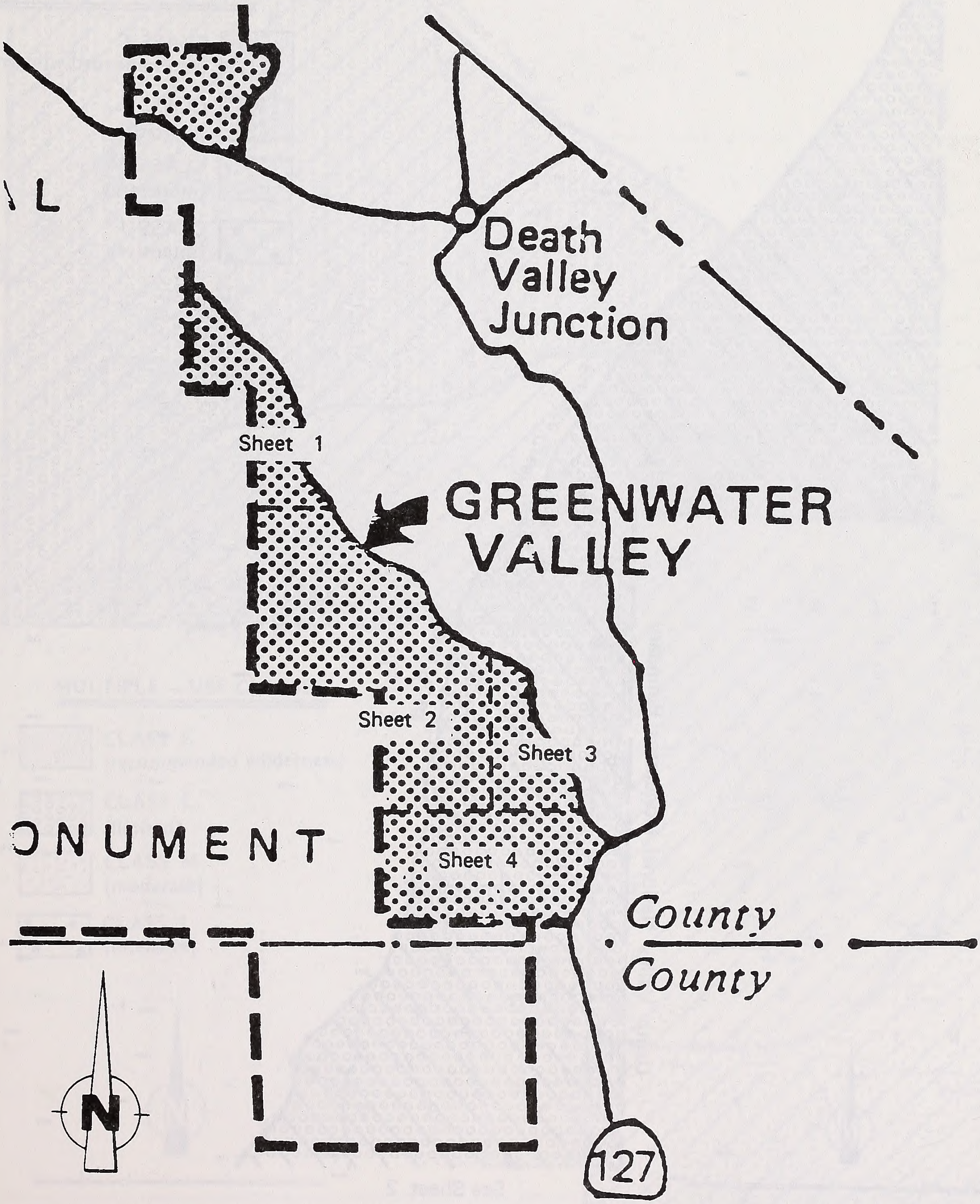
The current recreation use of parcel four is low. The uses that occur are primarily vehicle dependent activities such as rockhounding, camping, and off-highway vehicle touring. There are about 89 miles of routes of travel within the parcel, not including State Route 178 which is paved. This total includes 80 miles of BLM routes (mostly in the north and south ends of the parcel) and 9 miles of a county claimed road. Six miles of this county road is titled "Lost Section Road," while the other 3 miles is titled "Lost Section South."

These routes of travel are primarily related to present and historic mining in the area. Recreationists use the routes to explore remote parts of the desert, including remnants of old mining developments. The county claimed road provides access to the interior of administratively endorsed wilderness in Death Valley National Monument.

Greenwater Valley Index

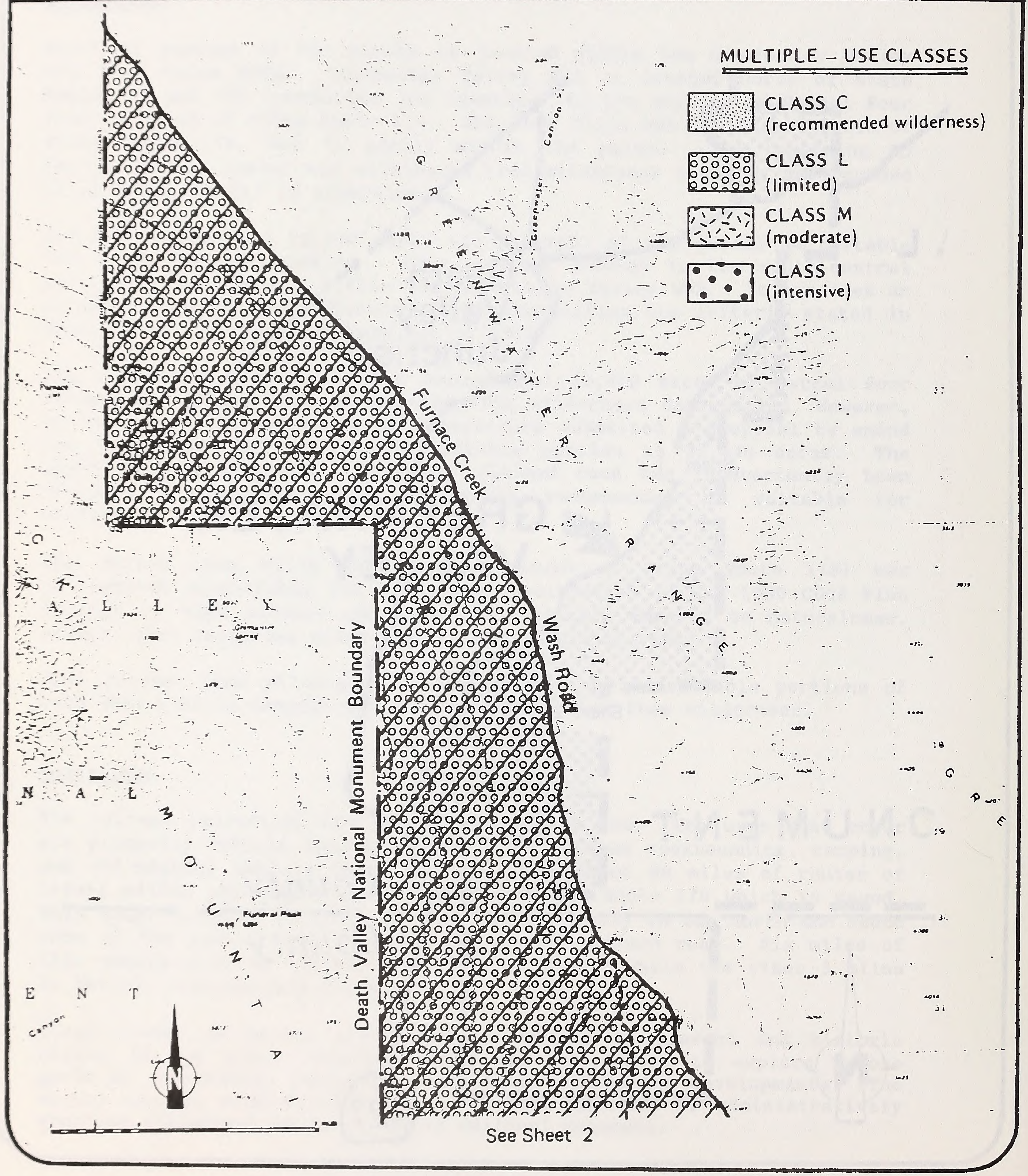
BLM - CDCA Plan Multiple-Use Class Map

MAP 3-10

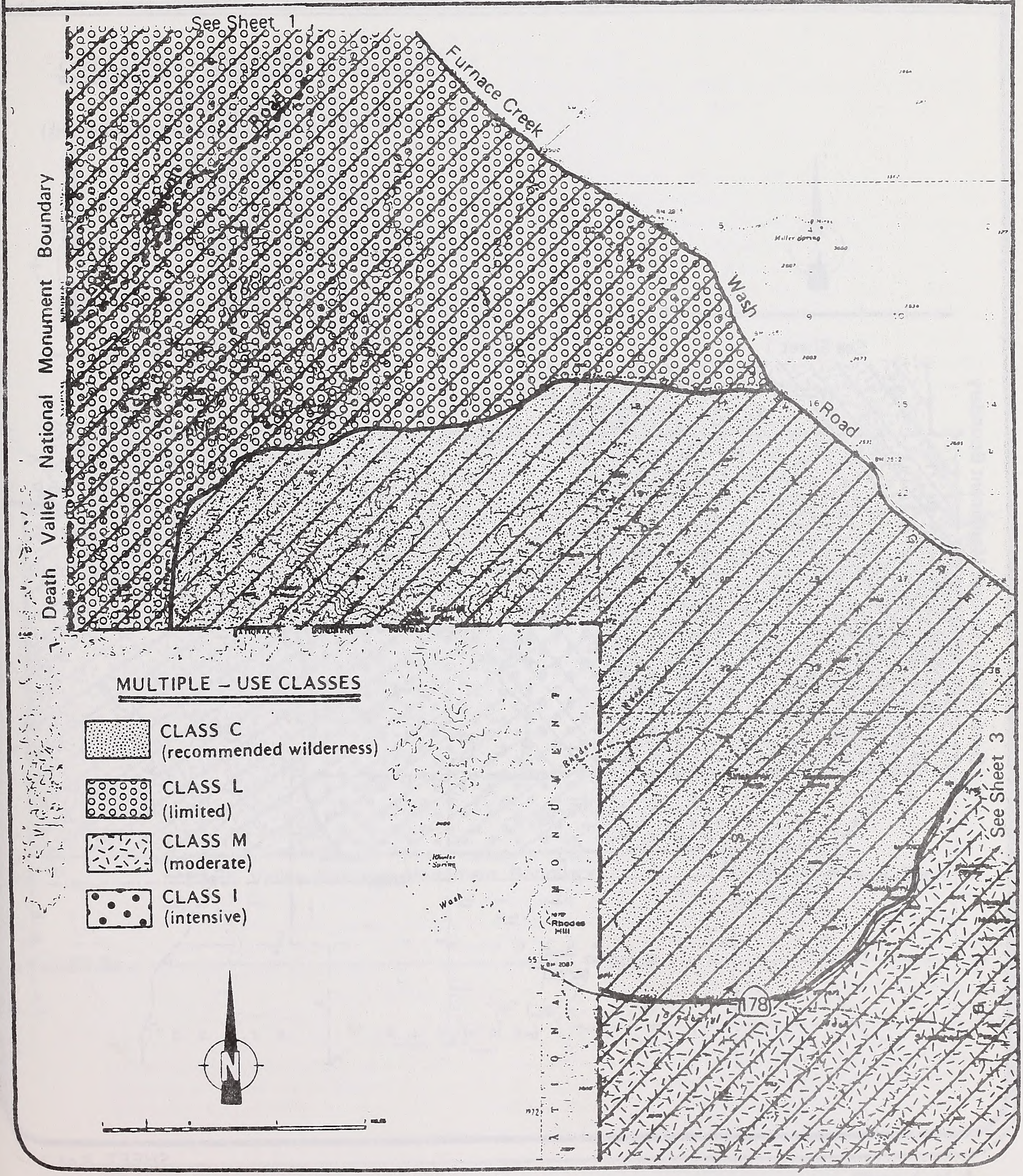

L
Death Valley Junction
Sheet 1
GREENWATER VALLEY
Sheet 2
Sheet 3
ONUMENT
Sheet 4
County
County
N
127

Greenwater Valley

BLM - CDCA Plan Multiple-Use Class Map 3-10


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
Furnace Creek
Wash Road
Death Valley National Monument Boundary
G R E E N W A T E R
R A N G E
Greenwater Canyon
V A L L E Y
N A L M O N U M E N T A
E N T
Funeral Peak
Canyon
N
See Sheet 2

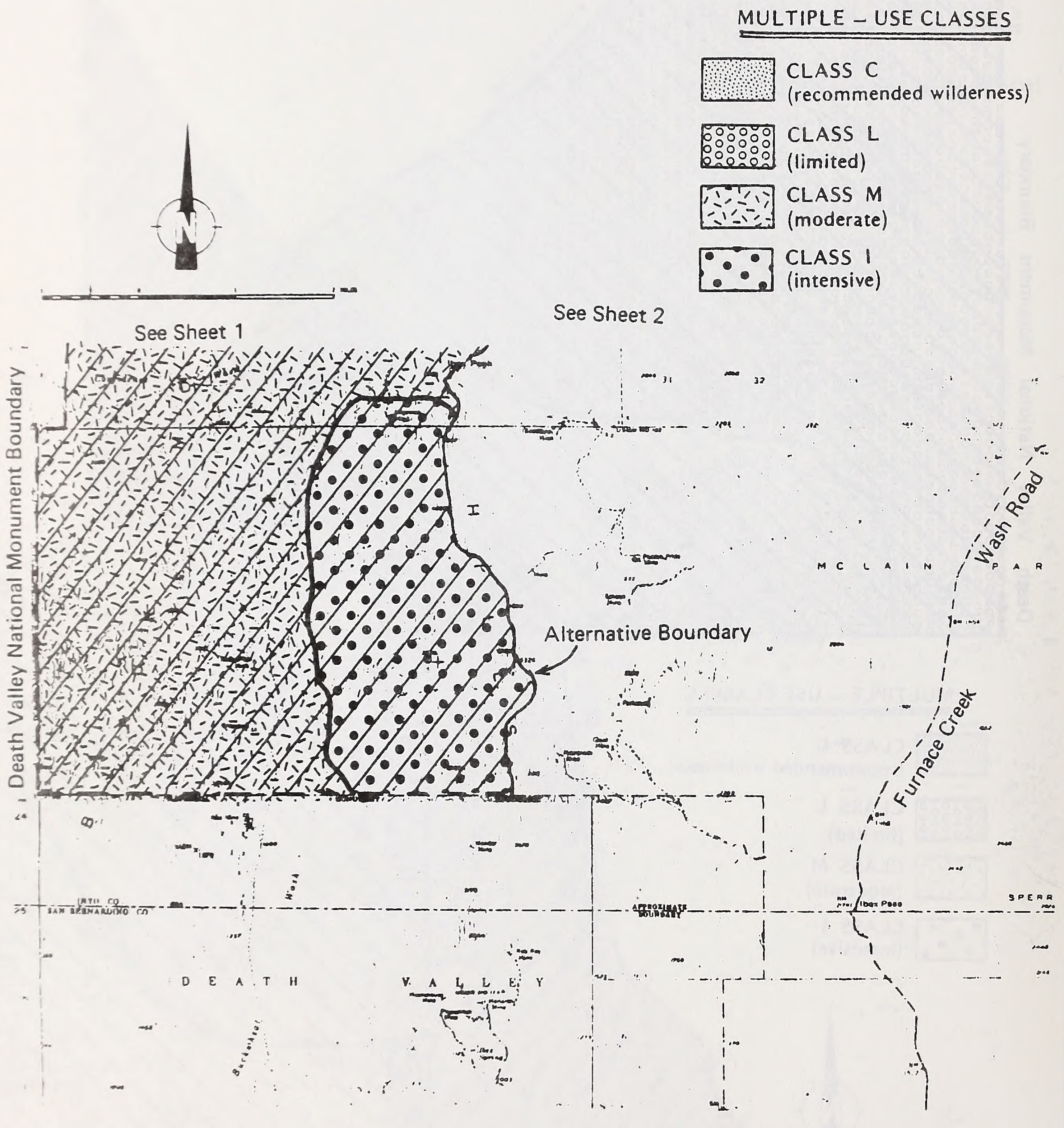
Greenwater Valley
BLM - CDCA Plan Multiple-Use Class Map 3-10


See Sheet 1
Furnace Creek Wash
Road
16
Death Valley National Monument Boundary
NATIONAL MONUMENT BOUNDARY
Miller Spring
Rhodes Spring
Wash
Rhodes Hill
55
178
See Sheet 3
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N

Sheet 2 of 4

Greenwater Valley/Ibex Hills Alternative

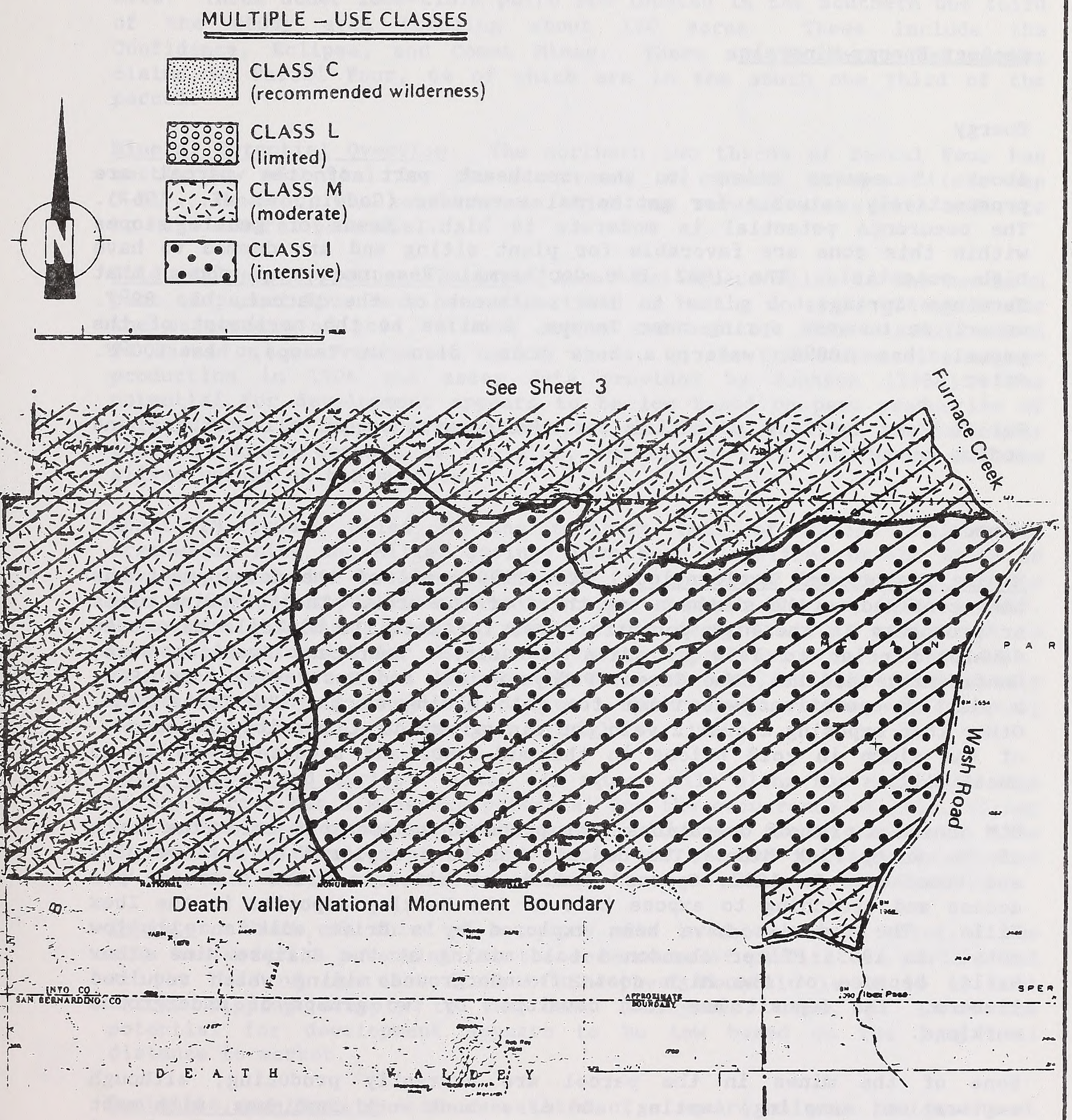
BLM - CDCA Plan Multiple-Use Class Map 3-14


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N
See Sheet 1
See Sheet 2
Death Valley National Monument Boundary
Alternative Boundary
Wash Road
Furnace Creek
M C L A I N
P A R
Ibex Pass
S P E R R
INYO CO
SAN BERNARDINO CO
APPROXIMATE BOUNDARY
D E A T H
V A L L E Y

SHEET 3 of 3

Greenwater Valley

BLM - CDCA Plan Multiple-Use Class Map 3-10


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N
See Sheet 3
Furnace Creek
Wash Road
PAR
Death Valley National Monument Boundary
NATIONAL
MONUMENT
INYO CO
SAN BERNARDINO CO
APPROXIMATE BOUNDARY
Ibex Pass
SPER
DEATH VALLEY

Sheet 4 of 4

About three miles of the existing routes of travel have been closed by BLM. The closures are in support of management goals and objectives within the adjacent monument.

Opportunities for primitive types of recreation such as backpacking are available. However, extreme temperatures and lack of available water severely limits the length and duration of such use.

Geology-Energy-Minerals

Energy

About 15 square miles in the southeast part of the parcel are prospectively valuable for geothermal resources (Godwin, et al., 1967). The occurence potential is moderate to high. Areas of gentle slopes within this zone are favorable for plant siting and are deemed to have high potential. The 1982 BLM Geothermal Resources map shows that Saratoga Springs, 7 miles to the southwest of the parcel, has 82°F. water; an unnamed spring near Tecopa, 8 miles to the northeast of the parcel, has 108°F. water; a bore hole, also in Tecopa, has 100°F. water.

Parcel Four has low potential for the occurrence of oil and gas and sodium resources.

Minerals

Mining History and Exploration: Since 1907, all of the development has been confined to the southern one third of the area. The following mines or prospects in the high potential area for metallic minerals have been developed prior to 1950 by adits (tunnels): American, American West, Confidence, Gold Hut, Who Cares, Paddys Pride, and Rusty Pick. In 1982, a plan of operations was filed for gold mining at the Who Cares Mine. Other than exposing a quartz vein, no mining was done, possibly because of the slump in gold prices in the mid-1980s and because there is no local mill.

BLM denied a plan of operations that proposed an open-pit talc mine north of the Rusty Pick Mine. The deposit has been explored by shallow pits and trenches. In 1987, Cypress Industrial Minerals filed a notice for access and trenching to expose talc of the Markley deposits in the Ibex Hills. The deposits have been explored by a drift adit and shallow cuts. In 1983, Pfizer abandoned talc mining at the Eclipse Mine (Ibex Hills) because of the high cost of underground mining which required timbers. The deposit has been developed by two groups of underground workings.

None of the mines in the parcel are currently producing, although exploration, sampling, testing, and assessment work continues, with most interest centered upon gold or talc. The one exception is a pair of Caltrans Material Sites which intermittently produce an estimated average annual total of 300 cubic yards of sand and gravel.

Parcel Four is open to mineral entry except for about 2,830 acres of State lands, 500 acres of patented mining claims, and about 50 acres of material sites rights-of-way located in the southeast part of the area.

Leases and Mining Claims: There are no mineral leases on parcel four. There are a number of patented claims within this area. A large block of patented claims comprising about 380 acres lies west of the Greenwater site. Three other lode-claim pairs are located in the southern one third of the study area totaling about 120 acres. These include the Confidence, Eclipse, and Comet Mines. There are 86 unpatented mining claims in Parcel Four, 64 of which are in the south one third of the parcel.

Mineral Potential Overview: The northern two thirds of Parcel Four has mostly low potential for the occurrence of mineral resources (see map 3-11). However, the southern one third has several areas with moderate to high mineral potential.

Gold, Silver, Copper and Barite: About two square miles in the northern part of parcel four have been classified as having moderate potential for the occurrence of gold, silver, copper and barite. This classification is based on occurrences of barite veins, on the Greenwater site copper production in 1906 and assay data provided by Johnson (1988). The potential for development appears to be low based on past production of only 20 tons of copper (Vredenburgh, et al., 1981, p. 251), the fact that the only known deposit is depleted, infrequent gold occurences and low silver values on the surface.

About 28 square miles in the northern half of Parcel 4 (between Greenwater site and Miller Spring) have been classified by the State as having speculative resources (MRZ-3b) for copper of hydrothermal origin in the form of a possible porphyry copper deposit (Taylor, 1986, p. 41). Under the BLM classification system, this designation is equivalent to having low potential for the occurrence of copper resources. It should be noted, however, that the deposit has not been drilled or adequately investigated by geochemical studies. Future exploration could easily change the potential to moderate or high.

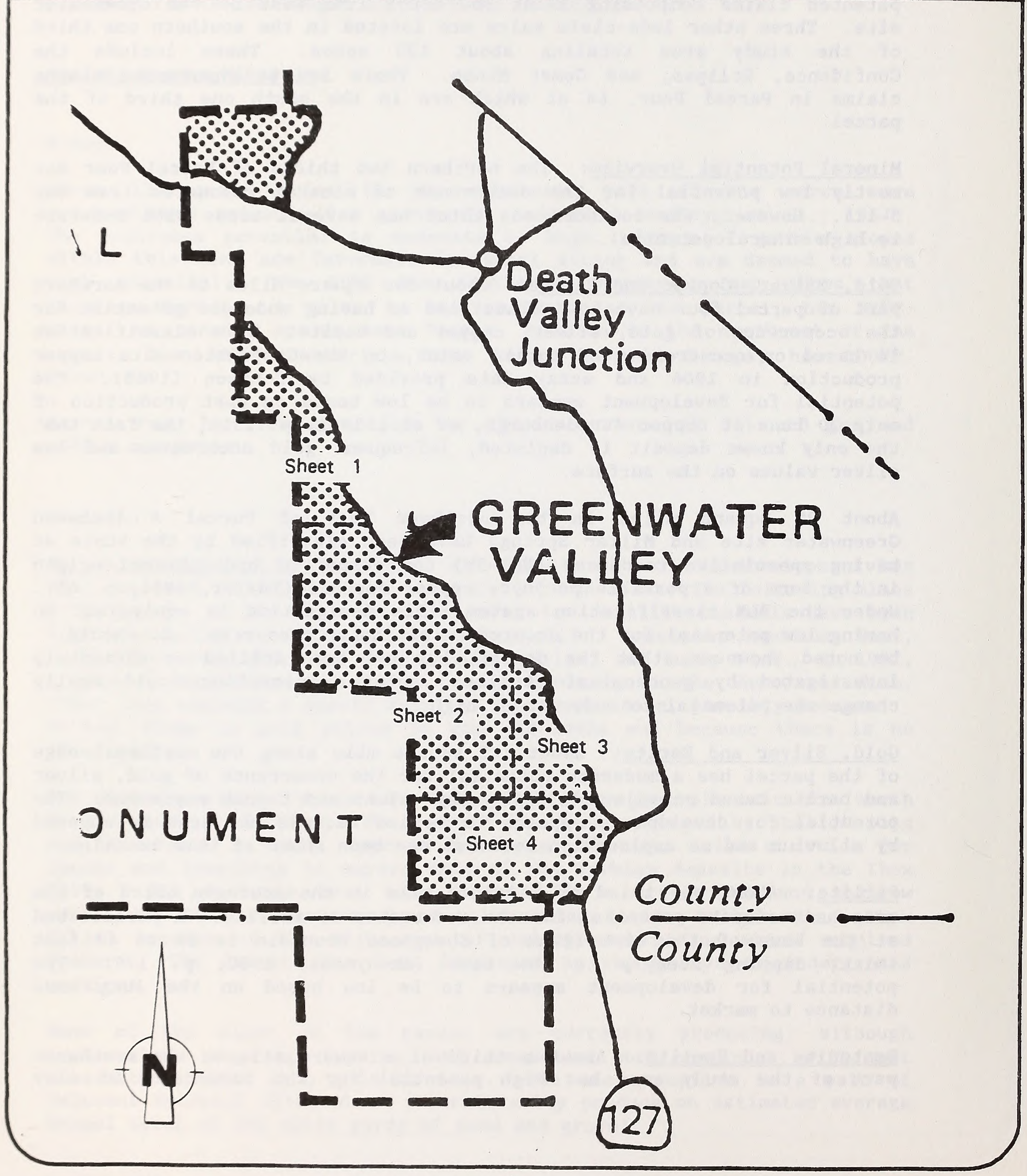
Gold, Silver and Barite: About 1/2 square mile along the northeast edge of the parcel has a moderate potential for the occurrence of gold, silver and barite based on adjacent high assay values and trench exposures. The potential for development appears to be low because the area is covered by alluvium and no exploration interest has been shown at this location.

Perlite: About one third of a square mile in the southern third of the area has moderate potential for the occurrence of perlite. A perlite bed at the base of the east flank of Sheephead Mountain is 25 to 40 feet thick, dipping steeply to the east (Anonymous, 1980, p. 17). The potential for development appears to be low based on the long haul distance to market.

Bentonite and Zeolite: About a third of a square mile in the southeast part of the study area has high potential for the occurrence of clay

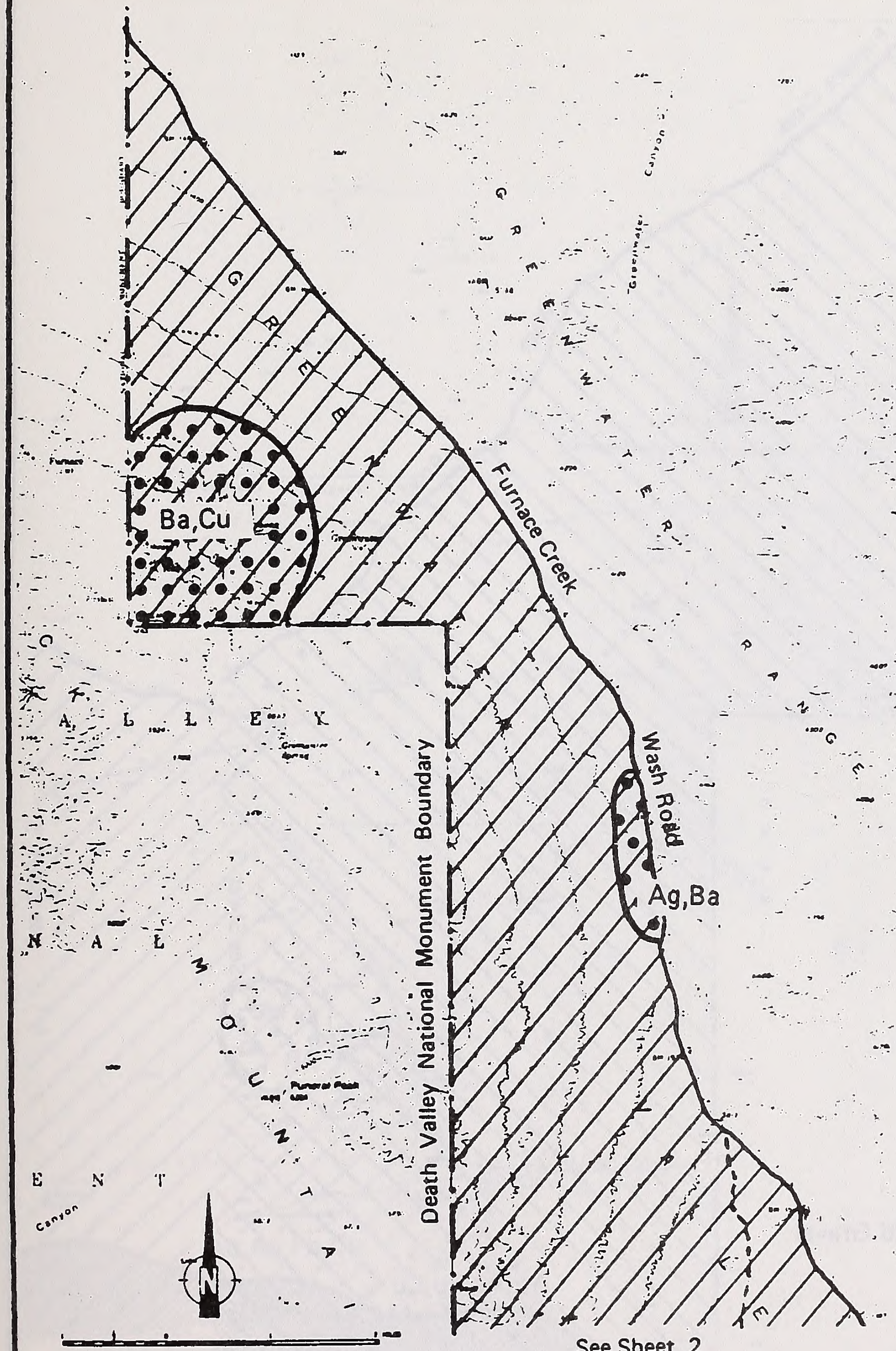
Greenwater Valley Index

Mineral Resource Potential MAP 3-11


L
Death Valley Junction
GREENWATER VALLEY
Sheet 1
Sheet 2
Sheet 3
Sheet 4
ONUMENT
County
County
N
127

Greenwater Valley
Mineral Resource Potential

MAP 3-11



GREENWATER RANGE
Furnace Creek
Wash Road
Ba,Cu
Ag,Ba
Death Valley National Monument Boundary
BLACK MOUNTAINS
VALLEY
Greenwater Canyon
Canyon
N

See Sheet 2

▩ High potential for the Occurrence of energy and/or non-energy minerals

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals

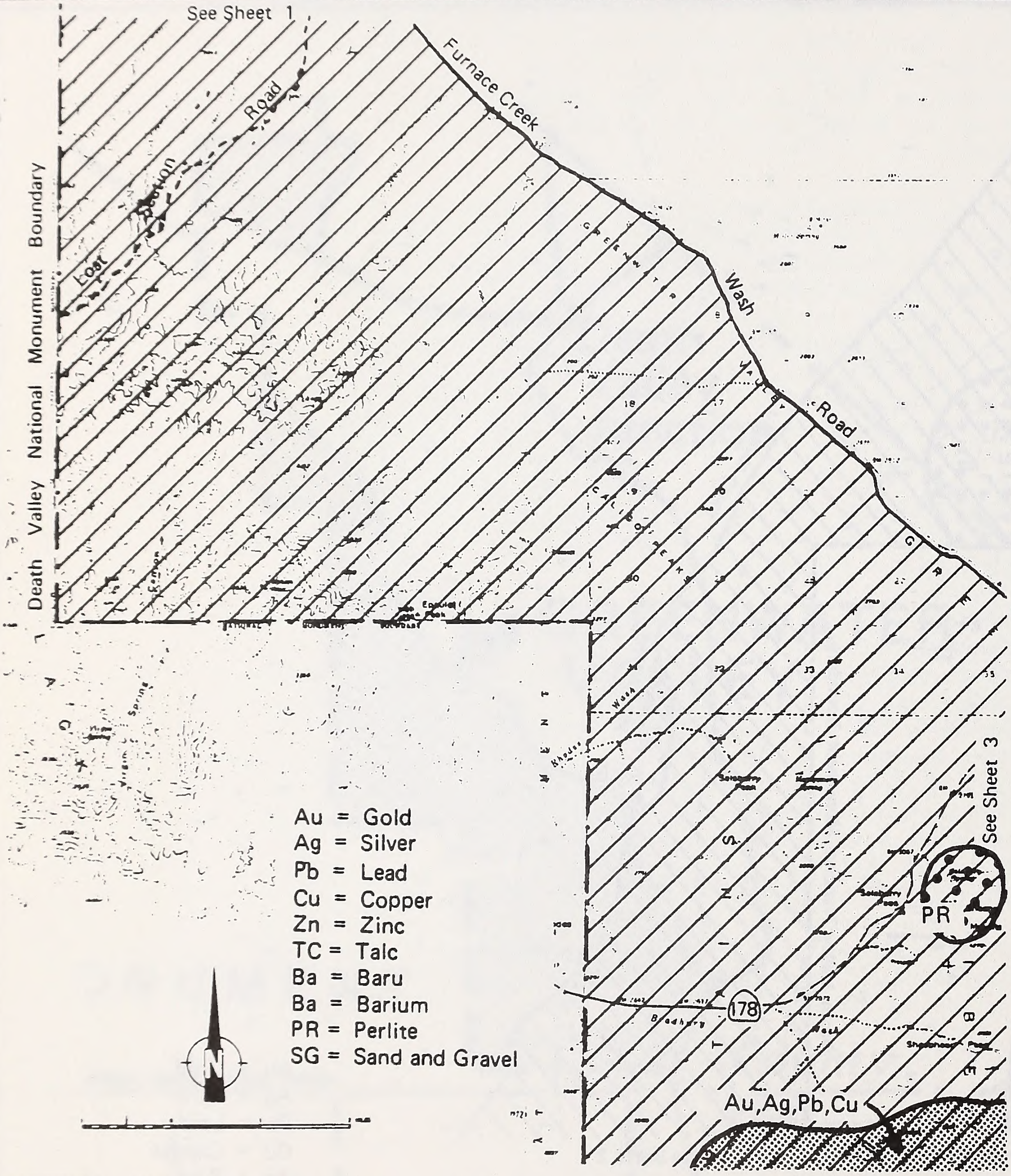
M Moderate mineral potential location in a High mineral potential area

Au = Gold
Ag = Silver
Pb = Lead
Cu = Copper
Zn = Zinc
TC = Talc
Ba = Baru
Ba = Barium
PR = Perlite
SG = Sand and Gravel

Sheet 1 of 4

Greenwater Valley

Mineral Resource Potential MAP 3-11


See Sheet 1
Furnace Creek
Road
Lost
Section
Death Valley National Monument Boundary
Wash
Road
Calico Peaks
Greenwater
See Sheet 3
PR
178
Au,Ag,Pb,Cu

Au = Gold
Ag = Silver
Pb = Lead
Cu = Copper
Zn = Zinc
TC = Talc
Ba = Baru
Ba = Barium
PR = Perlite
SG = Sand and Gravel

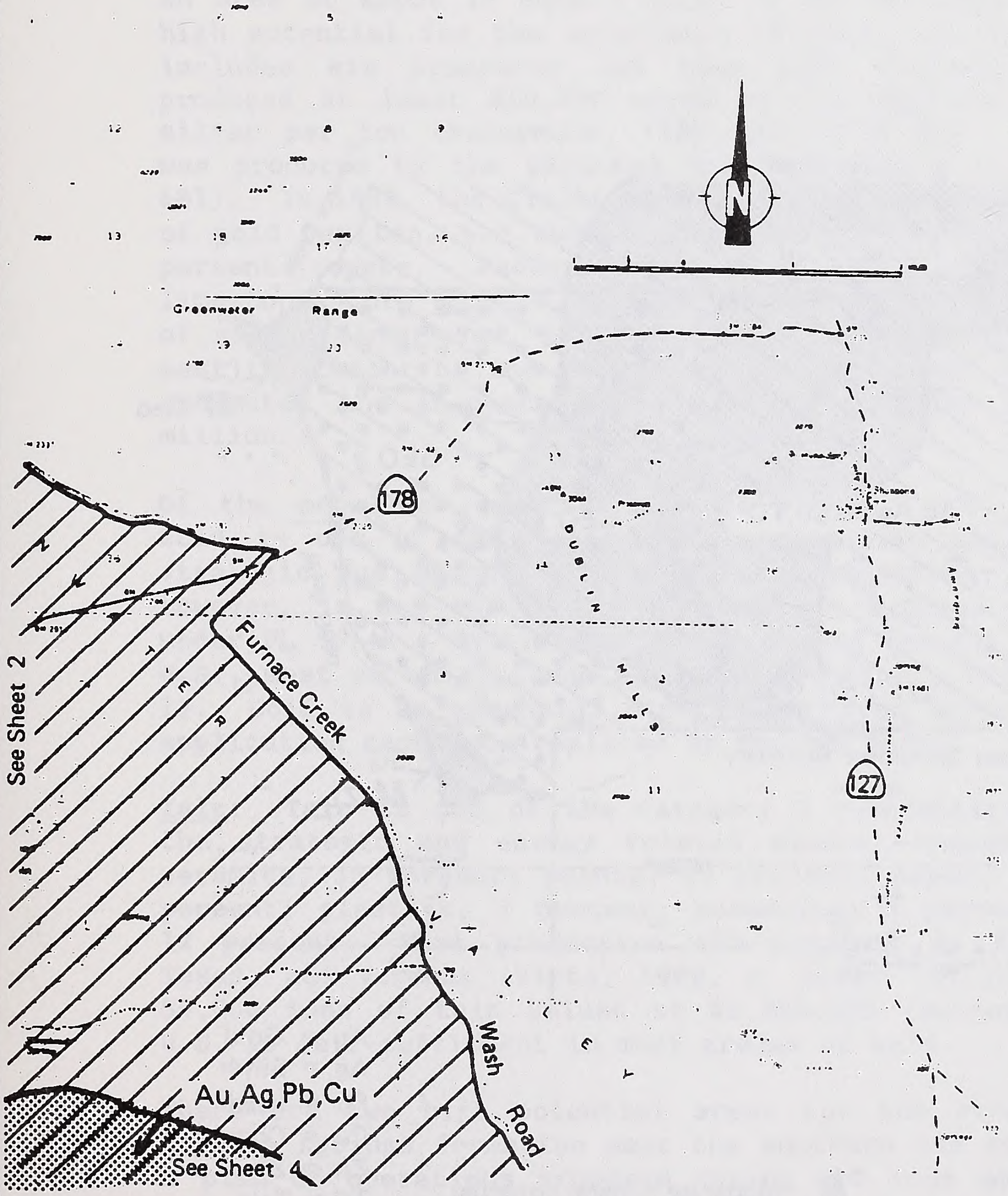
Sheet 2 of 4

▒ High potential for the Occurrence of energy and/or non-energy minerals

M Moderate mineral potential location in a High mineral potential area

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals

Greenwater Valley
Mineral Resource Potential MAP 3-11


N
Greenwater Range
178
DUBLIN HILLS
Shoshone
127
Furnace Creek Wash Road
See Sheet 2
Au,Ag,Pb,Cu
See Sheet 4

▒ High potential for the Occurrence of energy and/or non-energy minerals

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals

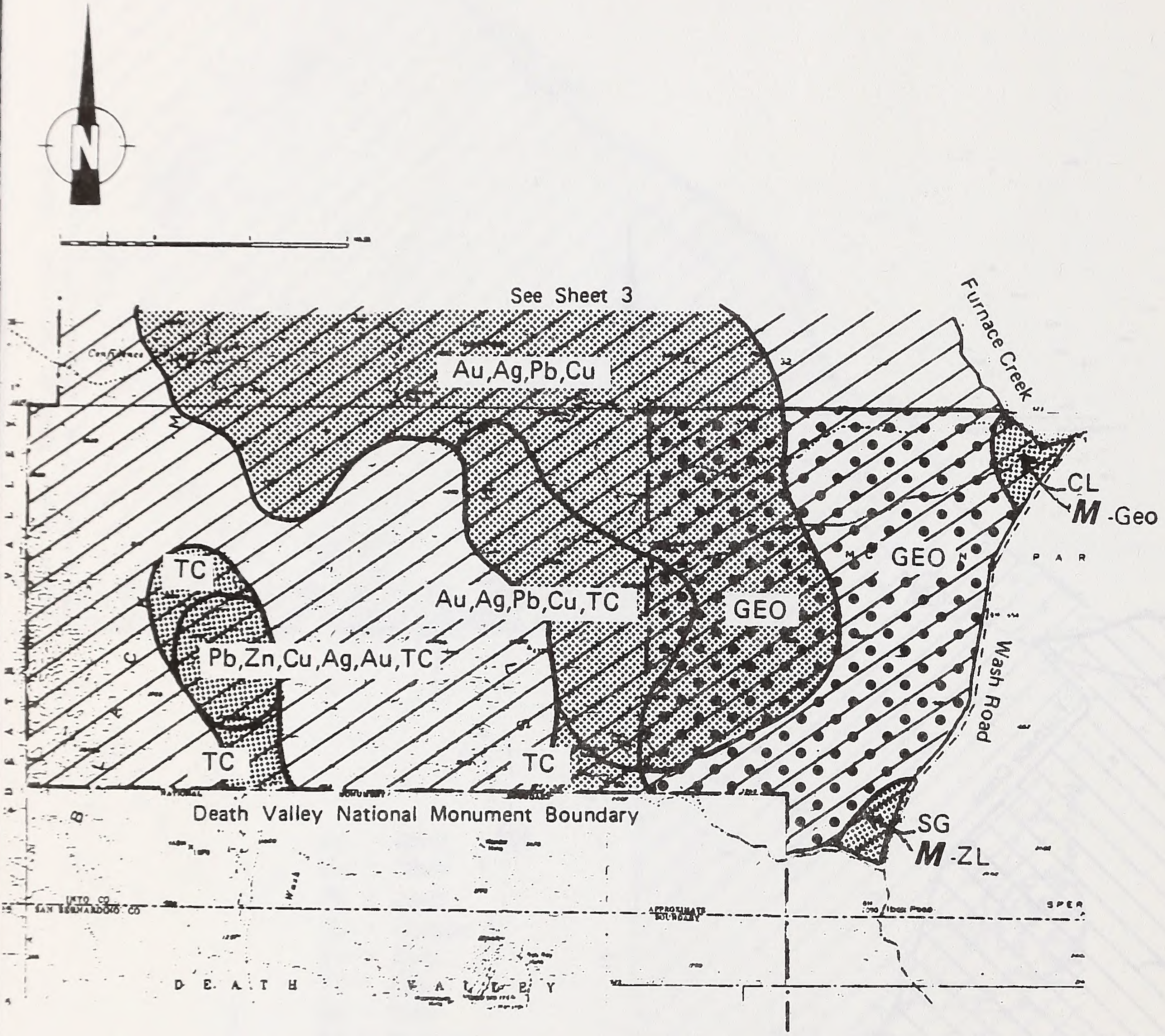
M Moderate mineral potential location in a High mineral potential area

Au = Gold
Ag = Silver
Pb = Lead
Cu = Copper
Zn = Zinc
TC = Talc
Ba = Baru
Ba = Barium
PR = Perlite
SG = Sand and Gravel

Sheet 3 of 4

Greenwater Valley
Mineral Resource Potential

MAP 3-11


N
See Sheet 3
Furnace Creek
Au,Ag,Pb,Cu
CL
M -Geo
GEO
GEO
PAR
TC
Au,Ag,Pb,Cu,TC
Pb,Zn,Cu,Ag,Au,TC
TC
TC
Wash Road
Death Valley National Monument Boundary
SG
M -ZL
INYO CO
SAN BERNARDINO CO
APPROXIMATE BOUNDARY
Ibex Pass
DEATH VALLEY

Au = Gold
Ag = Silver
Pb = Lead
Cu = Copper
Zn = Zinc
TC = Talc
Ba = Baru
Ba = Barium
PR = Perlite
SG = Sand and Gravel
Geo = Geothermal

▒ High potential for the Occurrence of energy and/or non-energy minerals

M Moderate mineral potential location in a High mineral potential area

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals (bentonite) and moderate potential for the occurrence of zeolite based on past production from a similar deposit just east of parcel four. Pfizer has produced bentonite and stockpiled zeolite at the open pit mine known as the "Ibex," $^1/_2$ mile west of Highway 127 (Van Allstine, 1984).

Metallic Minerals: An area of high potential for the occurrence of metallic mineral resources around the Rusty Pick mine (southwest part of parcel four) is based on past production of lead, zinc, copper, silver, and gold. The Ibex Mine, a former producer of lead, zinc, and silver, occurs just south of Parcel Four (Anonymous, 1980, p. 11). This mine would have seen recent development if it were outside of the monument boundary in F. Johnson's opinion (personal communication).

An area of about 16 square miles in the southern part of the parcel has high potential for the occurrence of gold, silver, lead, and copper, and includes six prospects and four past producers. The American Mine produced at least $10,000 worth of ore reported at over 100 ounces of silver per ton (Anonymous, 1980, pp. 10 & 11). A small amount of gold was produced by the patented Confidence Mine in 1934 (Greene, 1981, p. 681). In 1939, the Gladstone Mine shipped some ore which ran 0.33 ounces of gold per ton, 6.5 ounces of silver per ton, 3.58 percent lead and 1.2 percent copper. Paddys Pride Mine is a lead carbonite deposit in limestone. Ore shipped in 1919 ran 40 percent lead and 24 ounces per ton of silver (Anonymous, 1980, p. 12). A confidential report on gold veins near the center of the Ibex Hills WSA (southern one third of Parcel Four) estimates the in-place value of gold at four mines in excess of $25 million.

Of the metallic resources in the parcel, gold is the most important. Gold is one of the Category 1 commodities which include most of the strategic and energy related mineral resources (see table 4-3). Gold, however, is not one of the 75 minerals stockpiled by the United States under PL 96-41. California is the second leading producer of gold in the U.S., most of which comes from the California Desert (Anderson, 1988, p. 1). Gold is an essential mineral for high technology and its intrinsic application cannot be replaced by another metal.

Talc: Talc is one of the Category I commodities which include most of the strategic and energy related mineral resources. Talc is used in ceramics, 35 percent; paints, 17 percent; paper, 13 percent; roofing, 11 percent; plastics, 7 percent; cosmetics, 5 percent; and other products, 12 percent. Most production (95 percent) is from Montana, New York, Texas, and Vermont (Virta, 1988, p. 158). In 1986, California produced 59,000 tons of talc valued at $1,394,000 (Burnett, 1987, p. 227). The U.S. is self-sufficient in most grades of talc.

There are two high potential areas for the occurrence of talc of the crystal springs formation near the southern end of parcel four. In 1983, a plan of operations proposed mining 200 tons of talc per month from a 2,100 foot-long vein northwest of the Rusty Pick Mine. The plan was denied to preclude impairment of wilderness values. The other talc zone to the east includes six prospects and mines. The Arletta is an idle, past producer with shallow cuts (NW1/4 Sec. 19, T.20N., R.6E.). The

Comet (patented) was a past producer by Pfizer in W1/2 Section 18, T.20N., R.6E. The Eclipse (patented) is a recent producer by Pfizer in SW1/4 Section 7, NW1/4 Section 18, T.20N., R.6E. The Mammoth is a past producer by Pfizer developed by open pit in SE1/4 Section 36, T.20N., R.5E. The Markley is a discontinuous talc body extending for 2.5 miles and under exploration by Cyprus Exploration in Section 12, T.20N., R.5E. The Jim Frances (Giant) mine is a past producer in SW1/4, Section 19, T.20N., R.6E. (Wright, 1968, pp. 35-56).

Sand and Gravel: About 1/4 square mile in the southeast corner of Parcel Four has high potential for the occurrence of sand and gravel resources based on past production by Caltrans from two material sites in a wash deposit. Such a source is important, as stated below:

> "To the surprise of most, the vast desert areas of Southern California offer only limited quantities of mineral aggregate of the quality required for highway structural sections, concrete structures or rock slope protection (rip-rap). This situation appears to be attributable to the low rainfall characteristics of the desert. Mineral aggregate sites are customarily found only in some of the alluvial fans and washes where the deposits are carried down from the mountain areas by heavy storm runoff. Unfortunately, most of the larger (and better) fan deposits are now located in WSAs. Many fan deposits, while appearing to be good quality on the surface, may contain shallow deposits of undesirable clay and caliche or (most often) may contain a very poor quality mineral aggregate" (Longstreet, 1986, p. 3).

Water

There are three springs located within the Ibex Hills: Sheedhead, Salsberry, and Montgomery Springs. Flow levels have not been quantified, and the primary use of any surface water is by resident wildlife species.

PARCEL FIVE: PINTO BASIN

Wildlife

Wildlife habitats within the proposed transfer area are generally associated with the creosote brush scrub and wash woodland vegetation types. The creosote brush scrub type, including both rocky upland areas dominated by white bur sage (Ambrosia dumosa) and the lower creosote (Larea tridentata) dominated areas, is the most widespread vegetation type in the area proposed for transfer. Animal species commonly found within this vegetation type include coyote (Canis latrans), black-tailed hare (Lepus californicus), LeConte Thrasher (Toxostoma lecontei), and desert iguana (Dipsosaurus dorsalis).

Smoke tree (Dalea spinosa), palo verde (Cercidium floridum), and desert willow (Chilopsis linearis) are common plant species observed in the wash woodland vegetation type, along with commonly observed animal species such as coyote, Audubon cottontail (Sylvilagus audubonii), Verdin (Auriparus flaviceps), Phainopepla (Phainopepla nitens), Greater Road Runner (Geococcyx californianus), western whiptail (Cnemidophorus tigris), and zebra-tailed lizard (Callisaurus draconoides).

Unique Habitats

There are no unique habitats within the parcel.

Significant Species

No wildlife species presently listed under Section 4 of the Endangered Species Act are known or believed to occur within the lands designated for possible transfer to the National Park Service. One BLM sensitive species (desert tortoise, Gopherus agassizi) is, however, present within this area.

The desert tortoise which is also a category 2 candidate species for listing as threatened or endangered by the Fish and Wildlife Service (1985) is present in concentrations of up to 20-50 per square mile (BLM 1977). This concentration is located within a 4,000 acre block adjacent to the monument's existing eastern boundary in township 3 south, range 13 east. These tortoises are part of a relatively small core area representing the greatest known concentration of tortoises within Joshua Tree National Monument (50-100 per square mile). The northern half of the BLM-administered part of this concentration area is within the Pinto Basin Parcel.

Game animals

The only game species present within the proposed transfer area are mule deer (Odocoileus hemionus) in very sparse numbers throughout the area; Gambel quail (Lophortyx gambelii) in wash area and usually within close proximity to water; and mourning doves (Zenaidura macroura) coming in to water at available water sources.

Botany

There are no known federally or state-listed plant species within the Pinto Basin parcel. However, one BLM sensitive species (candidates for federal listing) have been recorded in the vicinity: Foxtail Cactus (Coryphantha vivipara var. alversonii) is recorded near the eastern boundary of the parcel, at elevations around 1000 feet.

Cultural Resources

The area is a portion of the Pinto Basin, and has experienced a minimum of cultural resource inventory due to it's remote geographical location. A records search of the archaeological sites that have been recorded in the region, however, reveals a propensity for relatively low site density. The few sites which have been recorded, nonetheless, tend to be important, multiple use sites, usually associated with centralized hunting and gathering activities. The areal distribution of these, and other types of sites, is not known, due to the lack of research thus far performed.

Existing threats to these resources predominately stem from pot hunting. The impacts thus far have been minimal.

Lands

The entire 4,480 acre parcel is classified as multiple use class L (limited use) by the CDCA plan (see map 3-12).

Management Presence

BLM's staff visits the parcel relatively infrequently. Rangers are based in Desert Center and Indio, but rarely have occasion to enter the parcel. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis: for example, to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. There has been little such activity in the parcel, so visits have been extremely infrequent.

Recreation

Recreational use of this 4,480 acre parcel is minimal. With the exception of a few short spur routes associated with past mining operations, no vehicle routes penetrate the area. This lack of access precludes most of the vehicle dependent activities known to occur in the general area.

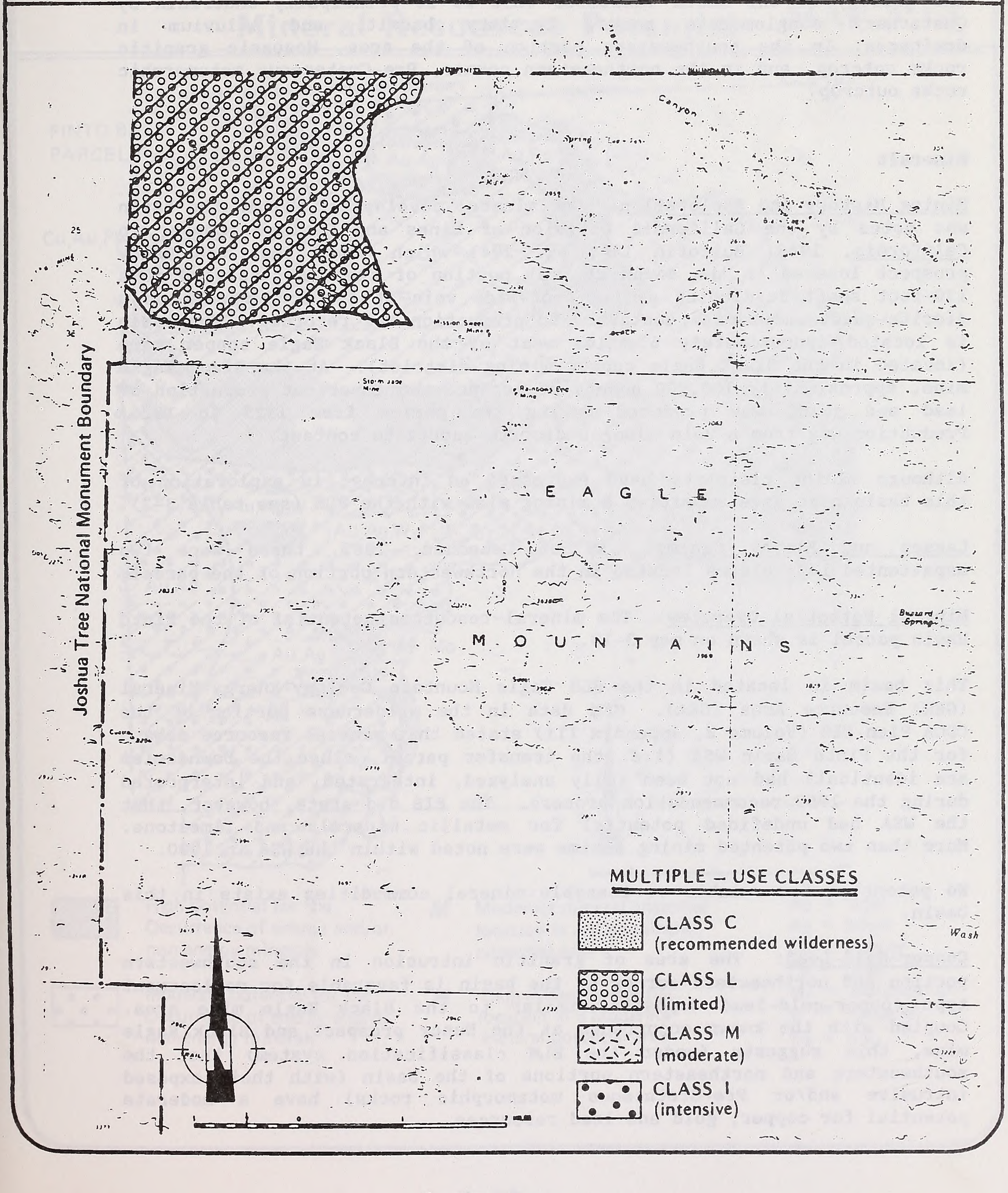
Opportunities for primitive and unconfined recreation do exist. The area is pristine and solitude is available. However, the topography is rather flat and lacks any unique or interesting features. The demand for these types of pursuits in this area is minimal. Little evidence of hiking or backpacking is evident.

Wilderness

All of the 4,480 acre WSA 334A (Pinto Basin) would be added to the monument. This WSA was recommended as non-suitable for designation by the CDCA plan.

PINTO BASIN

BLM - CDCA Plan Multiple-Use Class Map 3-12


Canyon
Spring
Mission Sweet Mine
Storm Jade Mine
Rainbows End Mine
Joshua Tree National Monument Boundary
E A G L E
M O U N T A I N S
Buzzard Spring
Wash
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N

Geology

The geology of the basin indicates that it is principally underlain by Quaternary conglomerate rocks, Tertiary basalt, and alluvium in drainages. In the southwestern portion of the area, Mesozoic granitic rocks outcrop, and in the northeastern corner, Pre-Cretaceous metamorphic rocks outcrop.

Minerals

Mining History and Exploration: One mineral development within the basin was noted by the California Division of Mines and Geology (Copper in California, 1948, Bulletin 144, pg. 294) which shows that the Nancy prospect located in the south central portion of the WSA consisted of a 130-foot shaft developing a four-foot-wide vein of copper minerals on a diorite-quartz monzonite contact. No production was recorded. The basin is located approximately 6 miles west of the Black Eagle copper mine (located in the Black Eagle copper mining district). At the Black Eagle mine, approximately 100,000 pounds of copper, and important production of lead and gold, was produced during the period from 1925 to 1926. Production was from a vein along a diorite-quartzite contact.

Although mining claimants have expressed an interest in exploration of this basin none have submitted a mining plan with the BLM (see table 3-2).

Leases and Mining Claims: As of December, 1987, there were two unpatented lode claims located in the northwestern portion of the parcel.

Mineral Potential Overview: The mineral resources potential of the Pinto Basin parcel is shown on map 3-13.

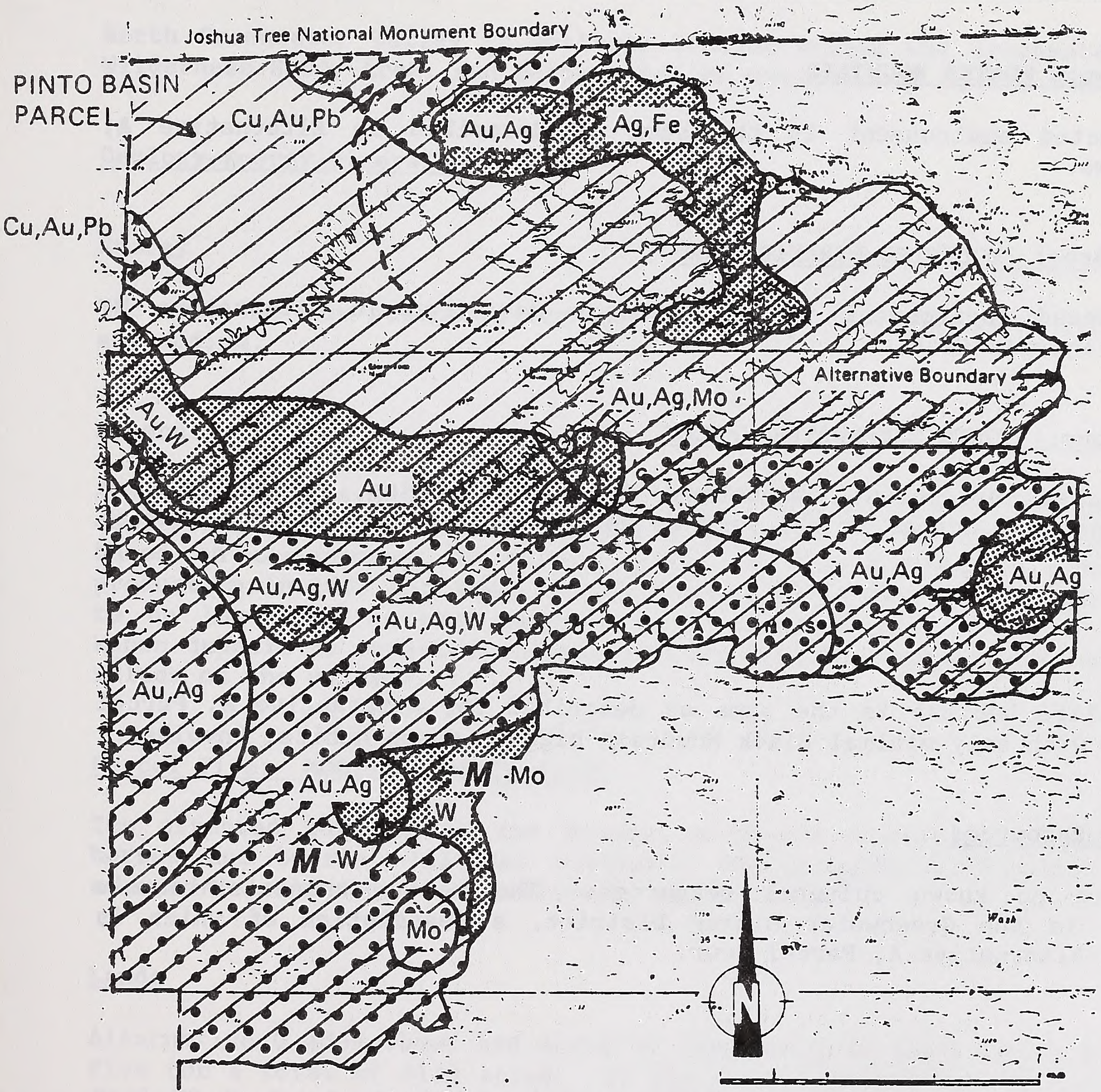
This basin is located in the BLM Eagle Mountain Geology-Energy-Mineral (GEM) Resource Area (GRA). GEM data in the wilderness portion of the CDCA Plan EIS (Volume B, Appendix III) stated that mineral resource data for the Pinto Basin WSA (i.e. the transfer parcel, since the boundaries are identical) had not been fully analyzed, integrated, and interpreted during the 1980 recommendation process. The EIS did state, however, that the WSA had undefined potential for metallic minerals and limestone. More than two patented mining claims were noted within the WSA in 1980.

No potential for salable or leasable mineral commodities exists in this basin.

Copper-Gold-Lead: The area of granitic intrusion in the southwestern portion and northeastern corner of the basin is favorable for replacement type copper-gold-lead deposits similar to the Black Eagle mine area. Coupled with the known occurrence at the Nancy prospect and Black Eagle mine, this suggests (under the BLM classification system) that the southwestern and northeastern portions of the basin (with their exposed intrusive and/or Pre-Cretaceous metamorphic rocks) have a moderate potential for copper, gold and lead resources.

Pinto Basin and Eagle Mountains Alternative Mineral Resources Potential

MAP 3-13


Joshua Tree National Monument Boundary
PINTO BASIN PARCEL
Cu,Au,Pb
Au,Ag
Ag,Fe
Cu,Au,Pb
Alternative Boundary
Au,Ag,Mo
Au,W
Au
Au,Ag,W
Au,Ag,W
Au,Ag
Au,Ag
Au,Ag
Au,Ag
M -Mo
W
M -W
Mo
N

▩ High potential for the Occurrence of energy and/or non-energy minerals

⁘ Moderate potential for the Occurrence of energy and/or non-energy minerals

M Moderate mineral potential location in a High mineral potential area

H High mineral potential location in a Moderate mineral potential area

Au = Gold
Ag = Silver
Cu = Copper
Pb = Lead
Mo = Molybdenum
W = Tungsten
Fe = Iron

Parcel One: NORTH DEATH VALLEY

The affected environment for the North Death Valley parcel of the Modified Alternative A is the same as described in Alternative A, Parcel One.

Parcel Two: HUNTER MOUNTAIN

The affected environment is the same as described in Alternative A, Parcel Two.

Parcel Three: MODIFIED PYRAMID PEAK

The affected environment is the same as described in Alternative D, Modified Pyramid Peak.

Parcel Four: NORTH GREENWATER VALLEY

The affected environment for botany, livestock grazing, recreation, and wild horses and burros is the same as described for Alternative A, Parcel Four.

Wildlife

The wildlife habitat is the same as described for Alternative A, Parcel Four but with only minimal Black Mountain bighorn sheep habitat involved.

Cultural Resources

There are no known cultural resources. The most prominent historic resource is the Greenwater Mining District, a description of which is given in Alternative A, Parcel Four.

Lands

Of the 7387 acres, nearly 87% (6367 acres) is public land; about 9% (640 acres) is State land; and 6% (380) is private land. The CDCA Plan designates the area as class L (limited use).

There are no other rights-of-way and the parcel is within the Complex 4 Alpha portion of the R-2508 Military Operation Area as noted in Alternative A, Parcel Four.

Management Presences

Management presences is the same as described Alternative A, Parcel Four except that two BLM rangers are posted in Shoshone.

Wilderness

North Greenwater Valley is entirely located within the Greenwater Valley Wilderness Study Area, and recommended as non-suitable by the BLM.

Geology-Energy-Minerals

Energy

The area has low potential for the occurrence of geothermal, oil and gas and sodium.

Minerals

About two square miles are classified as having moderate potential for occurrence of gold, silver, copper and barite. This classification is based on occurrences of barite veins, on the Greenwater site copper production in 1906 and assay data. The potential for development appears to be low based on past production of only 20 tons of copper and the known deposit is depleted and infrequence gold occurrences and low silver values on the surface.

Parcel Five: MODIFIED PINTO BASIN

The affected environment for botany, wildlife, livestock grazing, wild horses and burros, cultural resources and management presences is the same as described for Alternative A, Parcel Five.

Lands

Alternative G adds about 640 acres to 4480 acres in Alternative A, Parcel Five for a total of 5120 acres. Of the total public lands 4480 acres are designated class L (limited use) and 640 acres are designated as class I (intensive use).

Geology-Energy-Minerals

With the exception that this parcel will include about four additional mining claims, the description under Alternative A, Parcel Five, is the same.

ALTERNATIVE B:
MODIFIED GREENWATER VALLEY PARCEL

The affected environment for wildlife, botany, livestock grazing, wild horses and burros, cultural resources, management presence, and water is the same as described for Alternative A: Parcel Four.

Lands

The descriptions under Alternative A: Parcel Four are the same for this parcel, with the following differences.

Of the 97,505 total acres, nearly 96 percent (93,506 acres) is public lands, 3.6 percent (3,579 acres) is State lands, and 0.4 percent (420 acres) is privately owned. This alternative would omit approximately 16,000 acres of public lands, 3,579 acres of State lands, and 80 acres of private lands (two isolated mineral entry patents), all in the southeastern portion of Alternative A: Parcel Four.

The concentration of rights-of-way (LA-0164240, R-1483, R-01247, R-316 and R-06979 previously described) are omitted from this parcel.

The CDCA Plan designated the area as multiple use class C (proposed wilderness; 23,440 acres), class L (limited; 39,691 acres), class M (moderate; 18,091 acres), and class I (intensive; 5,952 acres). The multiple use class boundaries are shown on map 3-14.

Wilderness

Alternative B, in its entirety, is located within the Greenwater Valley and Ibex Hills Wilderness Study Areas. Unlike Alternative A: Parcel Four, this alternative excludes the non-WSA lands and the portion of the Ibex Hills WSA that is east of the crest of the Ibex Hills. Alternative B contains the same 23,440 acres as Alternative A: Parcel Four that BLM has recommended as suitable for wilderness designation.

Recreation

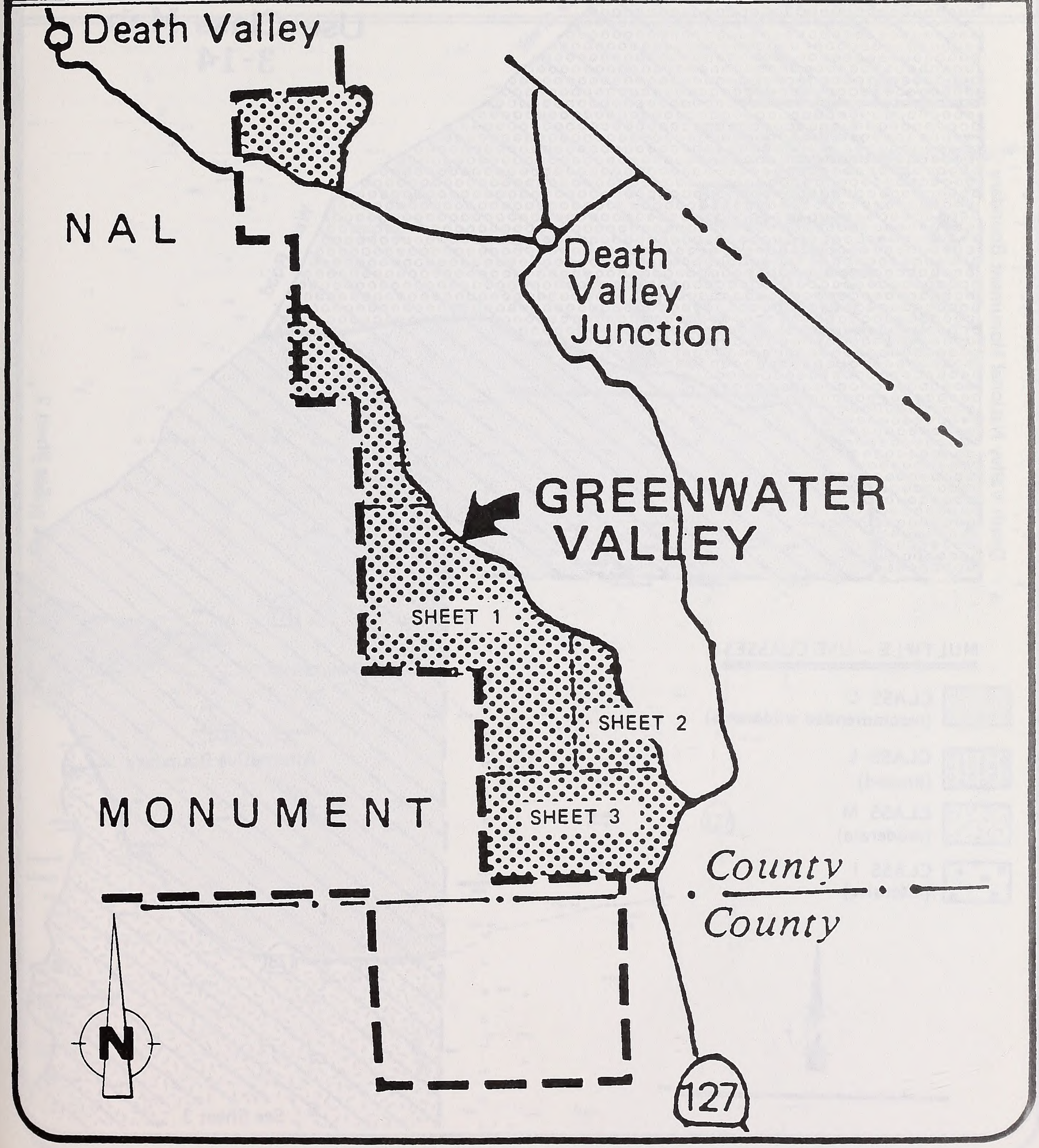
Recreation use of Alternative B is very similar to Alternative A: Parcel Four. However, Alternative B contains 22 less miles of designated open routes of travel.

Geology-Energy-Minerals

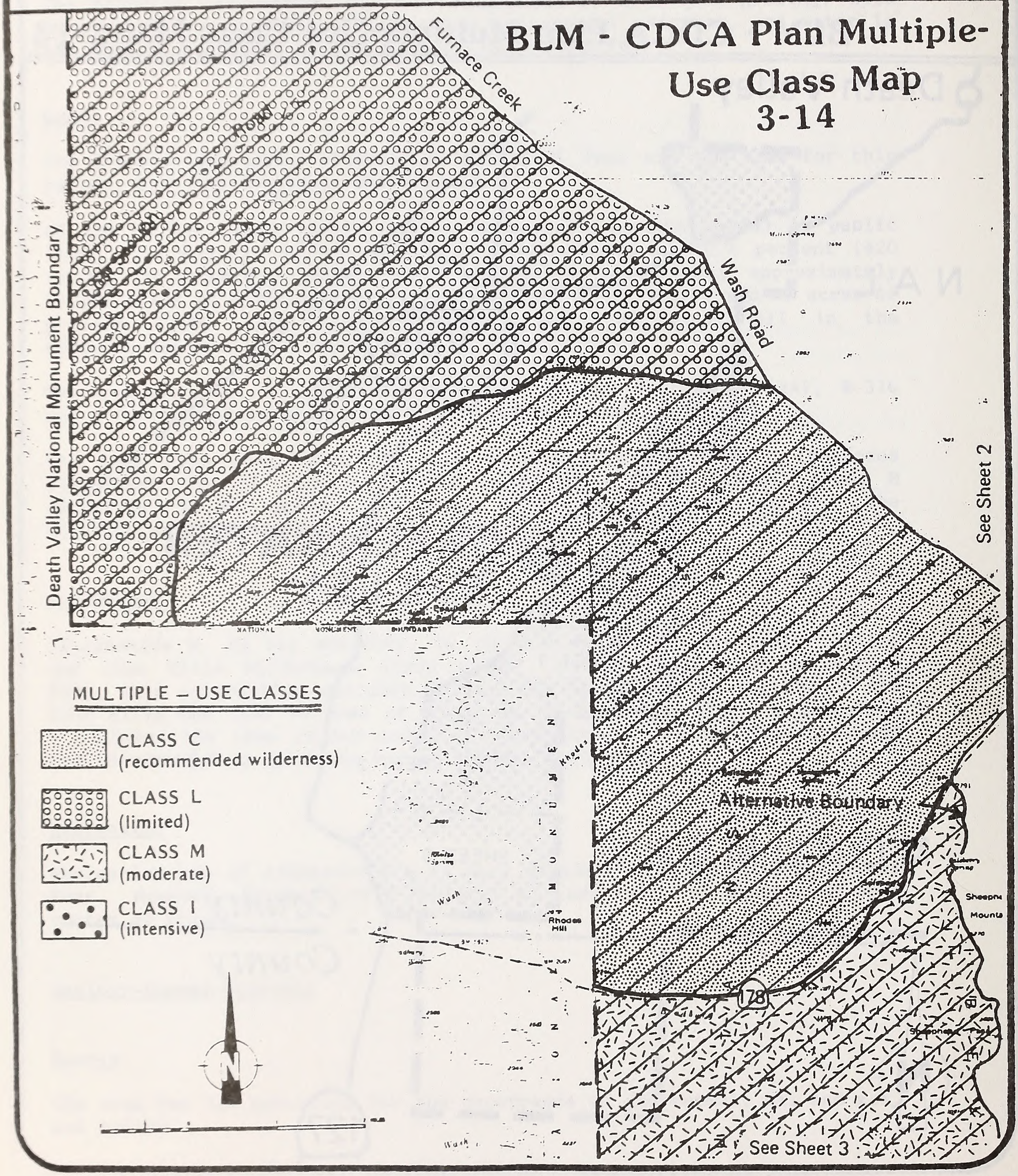
Energy

The area has low potential for the occurrence of geothermal, oil and gas, and sodium.

Greenwater Valley/Ibex Hills Alternative
INDEX
BLM - CDCA Plan Multiple-Use Class Map 3-14


Death Valley
NAL
Death Valley Junction
GREENWATER VALLEY
SHEET 1
SHEET 2
SHEET 3
MONUMENT
County
County
N
127

Greenwater Valley/Ibex Hills Alternative

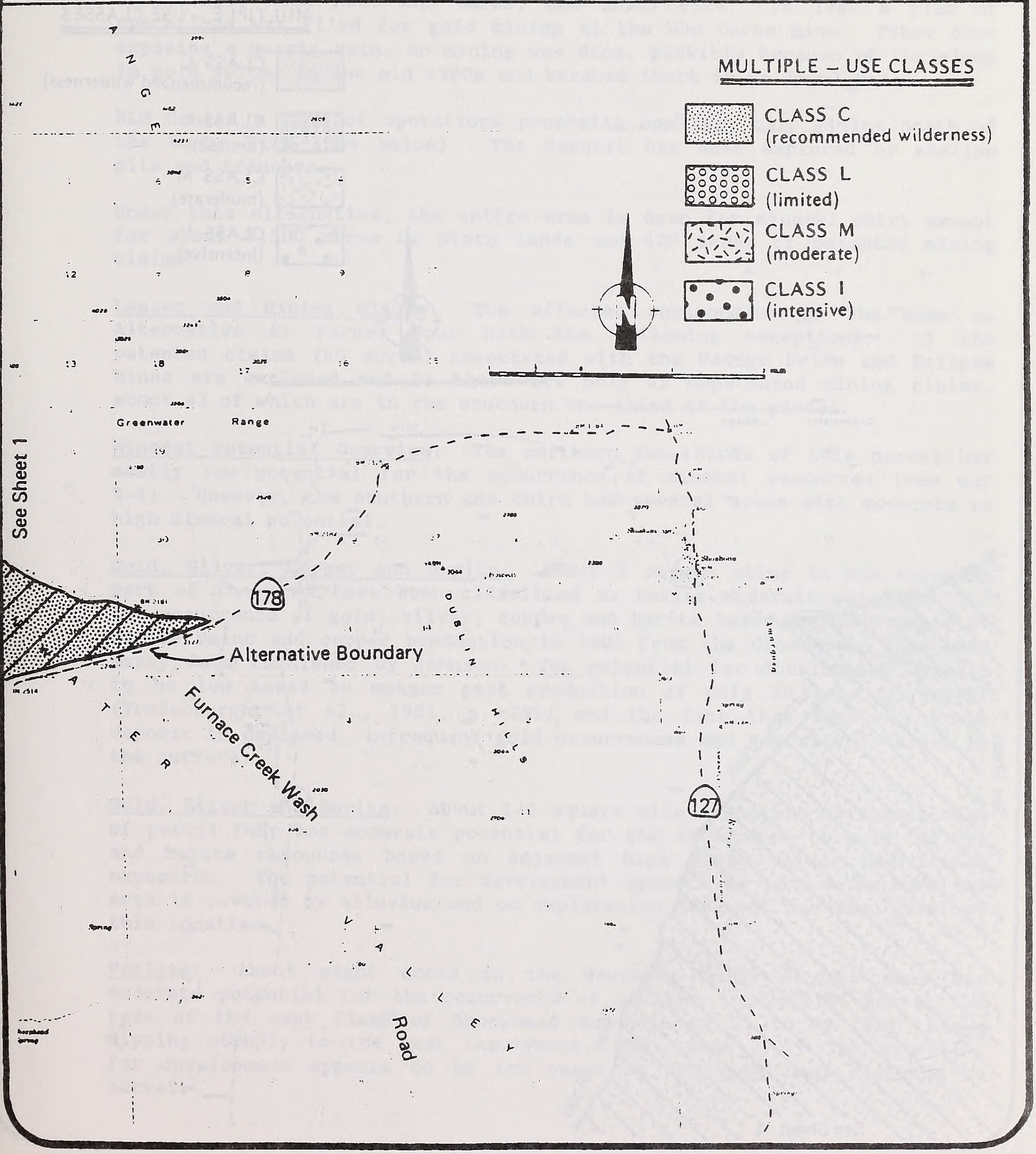


BLM - CDCA Plan Multiple-Use Class Map 3-14

Furnace Creek
Wash Road
Road
Death Valley National Monument Boundary
NATIONAL MONUMENT BOUNDARY
NATIONAL MONUMENT
See Sheet 2
Alternative Boundary
Rhodes
Rhodes Hill
Wash
178
See Sheet 3
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N

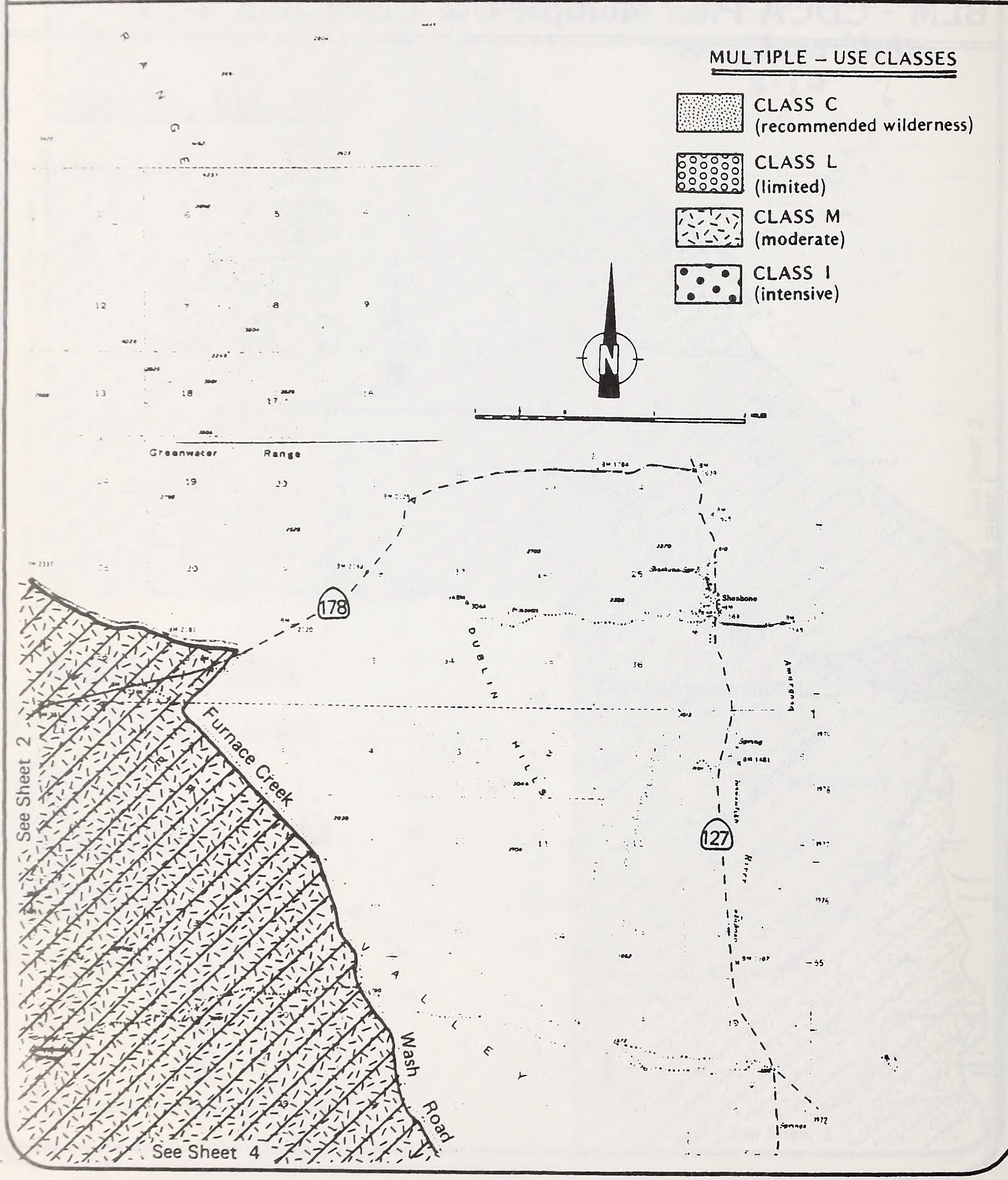
Sheet 1 of 3

Greenwater Valley/Ibex Hills Alternative
BLM - CDCA Plan Multiple-Use Class Map 3-14


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
Greenwater Range
See Sheet 1
178
Alternative Boundary
Furnace Creek Wash
127
Road

Sheet 2 of 3

Greenwater Valley
BLM - CDCA Plan Multiple-Use Class Map 3-10


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N
RANGE
Greenwater Range
178
DUBLIN HILLS
Shoshone
Furnace Creek Wash Road
VALLEY
127
Amargosa River
See Sheet 2
See Sheet 4

Sheet 3 of 4

Minerals

Mineral History and Exploration: Since 1907, all of the development has been confined to the southern one-third of the area. The following mines or prospects in the high potential area for metallic minerals have been developed prior to 1950 by adits (tunnels): American, American West, Confidence, Gold Hut, Who Cares, and Rusty Pick. In 1982 a plan of operations was filed for gold mining at the Who Cares mine. Other than exposing a quartz vein, no mining was done, possibly because of the slump in gold prices in the mid 1980s and because there is no local mill.

BLM denied a plan of operations proposing open pit talc mining north of the Rusty Pick (see below). The deposit has been explored by shallow pits and trenches.

Under this alternative, the entire area is open for mineral entry except for about 3,500 acres of State lands and 420 acres of patented mining claims.

Leases and Mining Claims: The affected environment is the same as Alternative A: Parcel Four with the following exceptions: 1) the patented claims (80 acres) associated with the Paddys Pride and Eclipse Mines are excluded and 2) there are only 65 unpatented mining claims, about 43 of which are in the southern one third of the parcel.

Mineral Potential Overview: The northern two-thirds of this parcel has mostly low potential for the occurrence of mineral resources (see map 3-4). However, the southern one third has several areas with moderate to high mineral potential.

Gold, Silver, Copper and Barite: About 2 square miles in the northern part of the area have been classified as having moderate potential for the occurrence of gold, silver, copper and barite based on occurrences of barite veins and copper production in 1906 from the Greenwater Site, and assay data furnished by Johnson. The potential for development appears to be low based on meager past production of only 20 tons of copper (Vredenburgh, et al., 1981, p. 251) and the fact that the only known deposit is depleted, infrequent gold occurrences and low silver values on the surface.

Gold, Silver and Barite: About 1/2 square mile along the northeast edge of parcel four has moderate potential for the occurrence of gold, silver and barite resources based on adjacent high assay values and trench exposures. The potential for development appears to be low because the area is covered by alluvium and no exploration interest has been shown at this location.

Perlite: About eight acres in the southern third of the area has moderate potential for the occurrence of perlite. A perlite bed at the base of the east flank of Sheephead Mountain is 25 to 40 feet thick, dipping steeply to the east (Anonymous, 1980, page 17). The potential for development appears to be low based on the long haul distance to market.

Metallic Minerals: An area of high potential for the occurrence of metallic mineral resources around the Rusty Pick mine (southwest part of the parcel) is based on past production of lead, zinc, copper, silver, and gold. The Ibex mine, a former producer of lead, zinc, and silver, occurs just south of the study area (Anonymous, 1980, p. 11).

An area of about $5^3/_4$ square miles in the southern part of the parcel has high potential for the occurrence of gold, silver, lead, and copper, and at least three prospects and two past producers. The American mine produced at least $10,000 worth of ore reported at over 100 ounces of silver per ton (Anonymous, 1980, pp. 10 & 11). A small amount of gold was produced by the patented Confidence mine in 1934 (Greene, 1981, p. 681). A confidential report on gold veins near the center of the Ibex Hills WSA (southern one third of the study area) estimates the in-place value of gold at four mines in excess of $25 million.

Talc: There is a high potential for the occurrence of talc in the Crystal Springs Formation near the southern end of the parcel. In 1983, a plan of operations proposed mining 200 tons of the talc per month from a 2,100 foot-long vein northwest of the Rusty Pick mine. The plan was denied to preclude impairment of wilderness values.

ALTERNATIVE C:
EAGLE MOUNTAINS

Wildlife

Wildlife habitats within the proposed transfer area are generally associated with the creosote brush scrub, cactus scrub, and wash woodland vegetation types. The creosote brush scrub type, including both rocky upland areas dominated by white bur sage (Ambrosia dumosa) and the lower creosote (Larea tridentata) dominated areas, is the most widespread vegetation type in the area proposed for transfer. Animal species commonly found within this vegetation type include coyote (Canis latrans), black-tailed jack rabbit (Lepus californicus), LeConte Thrasher (Toxostoma lecontei), and desert iguana (Dipsosaurus dorsalis).

Dominant plant species occurring in the cactus scrub are various species of cholla (Opuntia spp.), barrel cactus (Ferocactus acanthodes), and foxtail cactus (Coryphantha vivipara). Desert woodrat (Neotoma lepida), cactus mouse (Peromyscus eremicus), cactus wren (Campylorhynchus bruneicapillus), and black-troated sparrow (Amphispiza bilineata) represent animal species often observed in this community.

Smoke tree (Dalea spinosa), palo verde (Cercidium floridum), and desert willow (Chilopsis linearis) are common plant species observed in the wash woodland vegetation type, along with commonly observed animal species such as coyote, Audubon cottontail (Sylvilagus audubonii), Verdin (Auriparus flaviceps), Phainopepla (Phainopepla nitens), Greater Road Runner (Geococcyx californianus), western whiptail (Cnemidophorus tigris), and zebra-tailed lizard (Callisaurus draconoides).

Unique Habitats

The only known special habitat feature within the Eagle Mountains parcel is the water source at Buzzard Spring.

Significant Species

No wildlife species presently listed under Section 4 of the Endangered Species Act are known or believed to occur within the lands designated for possible transfer to the National Park Service. Two BLM sensitive species (desert tortoise, Gopherus agassizi; and desert bighorn sheep, Ovis canadensis nelsoni) are, however, present within this area.

Desert Tortoise: The desert tortoise, which is also a category 2 candidate species for listing as threatened or endangered by the Fish and Wildlife Service (1985), is present in concentrations up to 20-50 per square mile (BLM 1977). This concentration is located within a 4,000 acre block adjacent to the monument's existing eastern boundary in Township 3 South, Range 13 East. These tortoises are part of a relatively small core area representing the greatest known concentration of tortoises within Joshua Tree National Monument (50-100 per square mile).

Bighorn Sheep: The Eagle Mountains contain approximately 96,000 acres of potential mountain sheep habitat. This mountain range is the easternmost range of an interconnected series of ranges which also includes the Cottonwood, Hexie, Pinto, and Little San Bernardino Mountains.

At present 38,000 acres (40 percent) of the potential mountain sheep habitat within the Eagle Mountains is administered by the National Park Service, while 54,000 acres (60 percent) is administered by the BLM. The remaining 4 percent is owned by the State of California or is in private ownership. Of the mountain sheep habitat presently administered by BLM, 20,000 acres (38 percent) is proposed for transfer to the National Park Service.

During May 1986 a sheep survey of the Eagle Mountains was conducted by the California Department of Fish and Game and National Park Service. After five hours of helicopter time a total of 36 sheep were observed. Based on a "rule-of-thumb" observation rate of 60 percent, the actual population in the Eagle Mountains should approximate 60 animals. During the time of the survey over 80 percent of the observed mountain sheep were concentrated within the relatively well-watered portion of the west Eagle Mountains already under Park Service administration. The remaining sheep in the population also seem to be associated with existing water sources. Small bands were observed in the Eagle Tank-Cactus Mine area west-northwest of the Black Eagle Mine, and in the Buzzard Spring-Eagle Mountain area. In prior years bands have also been observed in the Hayfield Spring (Anshutz Well) and Hayfield Summit Spring areas.

As proposed, the transfer may involve up to 25 percent of the present mountain sheep population. This would include all sheep associated with the Cactus Mine-Eagle Tank and Buzzard Spring water sources.

Game animals

The only game species present within the proposed transfer area are mule deer (Odocoileus hemionus) in very sparse numbers throughout the area; Gambel Quail (Lophortyx gambelii) in wash areas and usually within close proximity to water; and Mourning Doves (Zenaidura macroura) coming in to water at available water sources.

Botany

There are no known federally or state-listed plant species within the Eagle Mountains parcel. However, two BLM sensitive species (candidates for federal listing) have been recorded in the vicinity:

(a) Foxtail Cactus (Coryphantha vivipara var. alversonii) is recorded near the eastern boundary of the parcel, at elevations around 1,000 feet.

(b) California Snakebush (Colubrina californica) has been documented in Boulder Canyon, approximately eight miles to the southeast of the parcel.

More than likely, both species occur within the parcel as well since both types of habitats supporting recorded populations are also found within the boundaries of that parcel.

Livestock Grazing

There is no current or scheduled livestock grazing within the parcel.

Wild Horse and Burros

There are no known wild horses or burros within the parcel.

Cultural Resources

The area includes portions of the Eagle Mountains which reach an elevation of nearly 4,000 feet and a segment of the Pinto Basin. Less then 1 percent of the total area has been sampled for the presence of cultural resources. The archaeological inventories that have been performed distinguish the area as having a low density of sites. The sites, however, are important, characterized by centralized areas of multiple use, usually associated with hunting and gathering. The sites are usually close to springs or major drainages.

This area is also distinguished by historical mining sites. One of these has been associated with both historic and prehistoric quarry/mining activities. This site is a relatively large jade quarry located in the northwestern portion of the parcel.

Because of the mountainous and remote location of the parcel, the archaeological and historical sites have experienced relatively little impact. The major cause of the impacts which have occurred has been from vandalism.

Lands

In addition to this, BLM has issued the following authorizations within the subject area:

R 04896	100 foot wide road R/W granted to Kaiser Steel Corporation under the Act of January 31, 1895. The grant affects Sections 29, 30, 32, 33, and 34, T. 3 S., R. 14 E., SBM.
R 04898	50 foot wide R/W for and electric transmission line and a pipeline, granted to Kaiser Steel Corporation under the Act of February 15, 1901. The grant affects Sections 29, 30, 32, 33, and 34, T. 3 S., R. 14 E., SBM.

No other authorizations of record exist within the area.

The parcel is almost entirely public land except for three scattered sections of State land, and private land patented under the mining laws. The CDCA Plan designated the area as multiple use class C (proposed wilderness; 19,906 acres), class L (limited; 4,865 acres), class M (moderate; 3,421 acres), and class I (intensive; 9,183 acres). The multiple use class boundaries are shown on map 3-15.

Management Presence

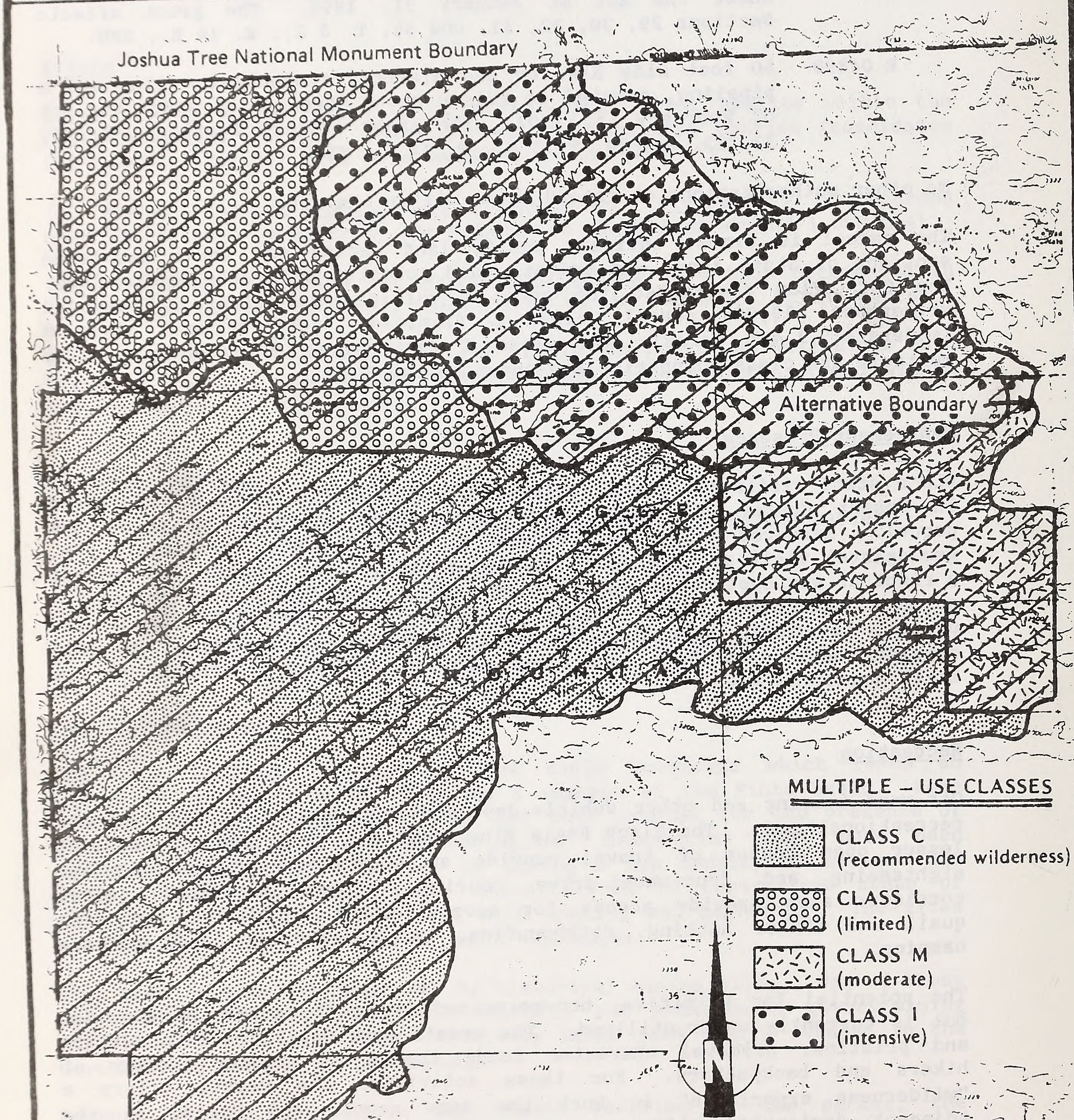
BLM's staff visits the parcel relatively infrequently. Rangers are based in Desert Center and Indio, but rarely have occasion to enter the parcel. Resource staff specialists (e.g. biologists, archaeologists, geologists) visit an area on an as-needed basis: for example, to process a right of way application or a mining plan of operation, or to prepare an ACEC management plan. There has been little such activity in the parcel, so visits have been extremely infrequent. In fact, the only regular checks have been associated with the monthly monitoring of the Eagle Mountains WSA.

Recreation

Off-road touring and other vehicle-dependent activities are the dominate recreational uses. The Black Eagle Mine Road, Big Wash, and a handful of lesser open routes of travel provide an outstanding opportunity for sightseeing and four-wheel-drive touring. These motorized travel corridors also provide access for several other activities including quail and chukar hunting, rockhounding, target shooting, and roadside camping.

The potential for primitive, non-motorized types of recreation abounds, but is currently under-utilized. The area's considerable scenic quality and pristine, primeval character lends itself to greater numbers of hikers and backpackers. For these activities the parcel offers a "wilderness experience" in much the same manner and degree as the adjacent designated wilderness located in the Joshua Tree National Monument (JTNM).

Eagle Mountains Alternative
BLM - CDCA Plan Multiple-Use Class Map 3-15


Joshua Tree National Monument Boundary
Alternative Boundary
EAGLE
MOUNTAINS
MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
N

Under CDCA Plan guidelines, motorized vehicle use is limited to designated open routes of travel. No closed areas or specific road closures have been designated in the parcel. A mining road that was illegally built across a portion of the Eagle Mountain WSA has been fully reclaimed and no longer exists.

Available access to the parcel is primarily four-wheel-drive, and is provided by two different routes: the Black Eagle Mine Road in the west and the Big Wash route of travel in the south. BLM considers Big Wash to be a primary open route because of the route's recreational value and its' significance as the only other public access to the Eagle Mountains outside of the monument.

Inside the area, public vehicle access is limited to several open short spur routes that branch from either the Black Eagle Mine Road or Big Wash. These routes are mostly mining roads to current or past operations. A much greater concentration of mining roads exists in the northeast corner of the study area where intensive mining activities occur. However, public vehicular access is blocked due to a lack of access through JTNM wilderness and locked gates at private land boundries.

Wilderness

Alternative C recommends that about 30,000 acres be added to the Joshua Tree National Monument. About 70 percent of this area overlaps the Eagle Mountain Wilderness Study Area (CDD WSA 334). A large portion of the included WSA (about 75 percent) has been recommended as suitable for wilderness designation. This suitable area accounts for about 55 percent of the total 30,000 acres.

Most of the Eagle Mountain WSA was recommended as suitable because: (1) the area possesses outstanding wilderness values; (2) it lies adjacent to existing designated wilderness in the monument; and (3) the area possesses many special features that would benefit from wilderness designation.

The rugged environment has served as a barrier and therefore man's imprint on the area is negligible. The WSA is a natural extension of the outstanding wilderness values found in the monument. Wilderness designation of this WSA would also enhance the bighorn sheep and desert tortoise habitats and protect the sensitive plant species and cultural resources found in the area.

Geology-Energy-Minerals

This alternative includes all of the Pinto Basin described in Alternative A and a portion of the Eagle Mountains. No economically recoverable salable or leasable minerals have been identified in any portion of this area. There are about 2 $^1/_2$ state sections and 800-1000 acres of private land on patented mining claims.

The following discussion considers separately the area within the Eagle Mountain WSA and the non-WSA lands (that is, public lands classified for limited and intensive use). This was done because new information has become available since the completion of the CDCA Plan EIS (U.S. Geologic Survey and U.S. Bureau of Mines reports done specifically for the WSA program), and because the mining history is significantly different between non-WSA and WSA lands.

WSA Lands

Leases and Mining Claims: As of December, 1979 there were nine patented and "numerous" unpatented mining claims in the northern part of the WSA (see table 3-2).

Table 3-2
Mineral Interest Status as of December 1987
Area Within Eagle Mountain WSA

TYPE	NUMBER			ACRES		
MINING CLAIM	SUITABLE	NONSUIT.	TOTAL	SUITABLE	NONSUIT.	TOTAL
Lode	4	61	65	80	1220	1300
Placer	0	0	0	0	0	0
Mill Site	0	28	28	0	140	140
Totals:	4	89	93	80	1360	1440

Mineral Potential Overview: The mineral resources potential of the Eagle Mountains parcel is shown on map 3-13.

The Eagle Mountain WSA is in the BLM Eagle Mountain Geology-Energy-Mineral Resource Area. The wilderness portion of the 1980 CDCA Plan EIS (Volume B, Appendix III) stated that mineral resource data for the WSA had not been fully analyzed, integrated, and interpreted. However, the EIS did state that the WSA had "possible" potential for metals and salable mineral resources.

In 1983, the USGS and U.S. Bureau of Mines (BOM) conducted a mineral survey of the suitable portion of the WSA. The results of the BOM survey were published in MLA 101-83 in 1983, and the joint report by the USGS/BOM in Open File Report (OFR) 84-631 (1984). MLA 101-83 concluded that the geologic features which localized the productive deposits of iron, gold, lead-silver, and copper in the Eagle Mountain mining district appear to be absent within the WSA. However, the USGS and BOM combined report (OFR 84-631), due to the additional sampling and geologic inference, indicated that the geologic environment at Eagle Mountain (similar to the nearby Chuckwalla Mountains, an area of known mineral occurrence and production) is highly favorable for the occurrence of metallic mineral resources (gold, silver, tungsten, molybdenum, bismuth, lead, and copper).

Stream sediment samples also showed anomalous mineral concentrations for lead, bismuth, and tin in the Eagle Mountains WSA. Through the use of geologic, geochemical, and geophysical data and a survey of mines and prospects to classify the suitable portion of the Eagle Mountains WSA, the USGS and BOM concluded in their combined report that those parts of the Eagle Mountains WSA that are intruded by altered mafic dikes (or hornblende porphyry dikes) with associated quartz veins and shear zones have moderate to high potential for the presence of undiscovered gold, silver, and tungsten. High stream-sediment concentrations of molybdenum also suggested that parts of those areas intruded by the dikes contain molybdenum minerals. Almost the entire WSA is classified under the BLM classification system as having a moderate potential for the occurence of gold, silver, tungsten, and molybdenum. Localized areas of high potential for the occurrence of gold and silver resources in the northwest, central, and south central portions of the WSA were also reported by the USGS and BOM.

Non-WSA Lands

Mining History and Exploration: Mr. Jerry Fawcett, Projects Manager for Kaiser Steel Corp., has indicated that Kaiser has several mineral related activities planned for it's Eagle Mountain Mine. These include the following:

1. Intent to sell iron ore to the cement industry for use in the cement manufacturing process.
2. Intent to sign a contract with Draco Mining to have Draco recover gold from the Kaiser Mine. Possible indications of a large low grade disseminated gold deposit suitable for heap leach mining similar to the operation at the Mesquite Mine in Imperial County.
3. Investigation of the possible recovery of gold from the tailings and waste material left from the iron mining.

Draco Mining has been conducting exploration in recent years on it's mining claims between the Pinto Basin WSA boundary and the western limits of the Kaiser Mine. At present there are proposals pending to use the deep pits at this mine as a dump for waste from the Los Angeles Basin. Whether or not such use will adversely impact the known mineral resources at the mine is unknown. None of the dump area is on lands being considered for this action.

Leases and Mining Claims: Mining interests in the Eagle Mountains parcel are shown on table 3-3.

Table 3-3
Mineral Interest Status as of April 1988
Area Outside Eagle Mountain WSA

TYPE MINING CLAIM	NUMBER TOTAL	ACRES TOTAL
Lode	149	2980
Placer	1	20
Mill Site	43	215
Totals:	193	3215

Mineral Potential Overview: These lands include the area east of Pinto Basin and north of the Eagle Mountain WSA boundary. This area potentially has the highest mineral values of the entire parcel. The Eagle Mountain Iron Mine was operated by the Kaiser Corporation until 1980 when the company went into chapter 11 bankruptcy. Kaiser claims that large reserves of iron ore still exists at the mine and that mining could begin again with improved market conditions. Most of the mine is on patented mining claims owned by Kaiser. The claims were originally staked for gold because of large quartz veins but Kaiser has only recovered the iron ore. Rumors circulated that the mine workers found free gold in quartz samples but the company rejected the idea of recovering the gold.

During informal communication with one of Kaiser's geologists and Bureau staff, it was claimed that Kaiser has had assay sample tests run on its large tailings and waste piles and that good values were returned for gold. This new information by Kaiser has not been substantiated; however, given the mining/exploration history of the area, the mines and patented claims west of this mine, the results of the USGS report for the Eagle Mountain WSA, and the persistance of the rumors it is unlikely that they do not have some basis in fact. If these claims are true there is a high potential for heap leach recovery of this gold (the most economical recovery method under present technology).

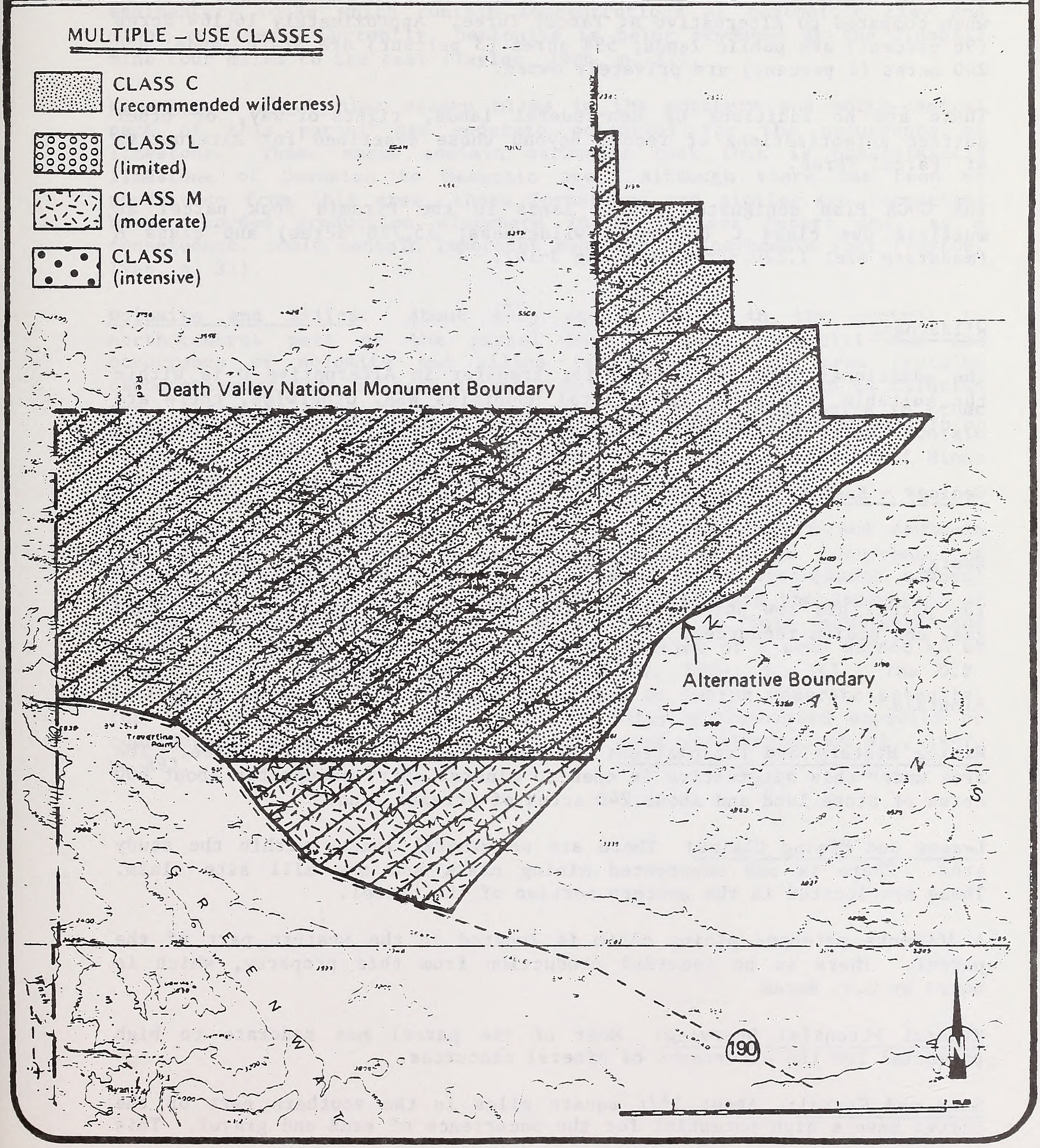
ALTERNATIVE D:
MODIFIED PYRAMID PEAK PARCEL

The affected environment for botany, livestock grazing, wild horses and burros, cultural resources, management presence, recreation, and water is the same as described for Alternative A: Parcel Three.

Wildlife

The affected environment is the same as in Alternative A: Parcel Three except that additional land in the foothills of the Funeral Mountains would be managed by the DVNM.

Pyramid Peak Alternative
BLM - CDCA Plan Multiple-Use Class Map 3-16


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
Death Valley National Monument Boundary
Alternative Boundary
Travertine Point
G R E E N W A
190
N
Ryan
Wash
Red

Lands

This parcel totals 16,998 acres, an addition of approximately 3,180 acres of public land in the northeast portion and deletion of approximately 590 acres of State land and 450 acres of public land in the southern portion when compared to Alternative A: Parcel Three. Approximately 16,164 acres (96 percent) are public lands; 594 acres (3 percent) are State lands; and 240 acres (1 percent) are privately owned.

There are no additions of non-federal lands, rights-of-way, or other surface authorizations of record beyond those described for Alternative A: Parcel Three.

The CDCA Plan designated public lands in the Pyramid Peak parcel as multiple use class C (proposed wilderness; 15,778 acres) and class M (moderate use; 1,220 acres)(see map 3-16).

Wilderness

The additional land recommended for transfer in Alternative D is within the suitable portion of the Funeral Mountains WSA. Otherwise, there are no differences between Alternative D and Alternative A: Parcel Three.

Geology - Energy - Minerals

Energy

The parcel has low potential for the occurrence of geothermal, oil and gas, and sodium resources.

Minerals

Mining History and Exploration: See Alternative A, Parcel Three. The area under this alternative is open to mineral entry except for about 600 acres of State land and about 240 acres of private land.

Leases and Mining Claims: There are no mineral leases within the study area. There is one unpatented mining claim and one mill site claim. These are located in the eastern portion of the parcel.

A 160-acre patented mining claim is located in the western part of the parcel. There is no recorded production from this property, which is owned by U.S. Borax.

Mineral Potential Overview: Most of the parcel has moderate to high potential for the occurrence of mineral resources.

Sand and Gravel: About $1^1/_4$ square miles in the southern part of the parcel have a high potential for the occurrence of sand and gravel. This is based on the similarity of these deposits to a past extraction site $5^{1}/_{2}$ miles to the southeast where Caltrans has removed about 30,000 cubic yards of aggregate for the maintenance of Highway 190.

Bentonite and Zeolite: Nearly five square miles in the northeast part of this parcel has moderate potential for the occurrence of clay (bentonite) and zeolite. This area is underlain by Tertiary-age tuffaceous sedimentary rocks which contain concentrations of bentonitic clay and minor zeolites. Currently, bentonite is being produced at the Sidehill mine four miles to the east (Taylor, 1986, p. 32).

Limestone: About nine square miles in the northern and north-central part of this parcel has moderate potential for the occurrence of limestone. These areas contain carbonate rock that is predominantly limestone of Devonian to Mesozoic age. Although there has been no production from this area, these formations and similar-age formations have recorded production elsewhere in the Mojave Desert and, as a consequence, could contain important resources of carbonate rock (Taylor, 1986, p. 33).

Dolomite and Silica: About $4^{1}/_{2}$ square miles in the central to north-central part of the parcel have moderate potential for the occurrence of dolomite and silica (quartzite). This area contains carbonate rock that is predominantly dolomite of Precambrian to Silurian age. Carbonate rocks of equivalent ages have produced dolomite in other areas of California and, as a consequence, this area could contain resources (Taylor, 1986, p. 33) as shown in California Division of Mines and Geology Bulletin 194 (Bowen, et al., 1973).

Boron (Borates): About $2^{1}/_{2}$ square miles in the western and southern part of the parcel have moderate potential for the occurrence of borates. This area is within a broad zone which encompasses several areas known to contain identified borate reserves, and the assumption of a moderate potential represents a synthesis of both published and proprietary company data regarding the delineation of a zone deemed to be favorable for borate mineralization (Taylor, 1986, p. 34). The U.S. Geological Survey has classified this area as having moderate potential for the occurrence of borate resources since undiscovered deposits of considerable size may be present in this area (Armstrong, et al., 1987, p. A9).

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

CHAPTER IV

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter provides the scientific and analytic basis for the selection of the preferred alternative. It discusses the significant impacts that would result from both transfer and retention of each of the parcels. Both the beneficial and adverse effects are presented. Knowledge of the area and professional judgement (based on observation and analysis of similar conditions and responses in similar areas) have been used to estimate effects where data is limited.

The analysis is based on the following assumptions:

1. Death Valley would form an ad-hoc management evaluation team shortly after the transfer to evaluate the parcels. After consultation with BLM, and after observing the level of use of each parcel, an evaluation of staffing and funding needs would be developed.

   For the purposes of this analysis, it is assumed that, if the parcels were transferred, Death Valley National Monument's permanent staff would be increased by an amount proportional to the increase in the size of the monument (about 5 percent). New staff could include four to five persons and comprise maintenance and resource skills.

2. Joshua Tree National Monument would not require any staff increases.

3. Baseline data are accurate.

Within each parcel analysis, the discussion is organized by resource (e.g. wildlife, cultural resources, geology-energy-minerals). Only those resources that would be affected are discussed. A resource that is not expected to be affected is not addressed.

ALTERNATIVE A: PROPOSED ACTION

Parcel One: North Death Valley

Wildlife

There would be both negative and positive impacts on wildlife. In general, habitat conditions would improve slightly due to continued feral burro removal, especially in the Sand Spring and Little Sand Spring areas. Management of the Death Valley ecosystem would be more consistent under one agency.

Riparian and aquatic habitats at Sand Spring would continue to be protected through the use and maintenance of the existing fence at Sand Spring. This fence was constructed in 1984 by the BLM. The Park Service would provide protection for riparian and aquatic habitat at Little Sand Spring by removing burros and cattle rather than by constructing a fence (Essingnton, personnal communication). This would be effective in protecting the springs, but only if NPS removal efforts are frequent and effective enough to keep out burros. Should burros be effectively eliminated from these two springs, burro use of adjacent mountainous habitat in the Last Chance Range would be greatly reduced, as would drift into the present monument (especially in the Grapevine Springs area).

Bird diversity and abundance at Sand Spring may decrease because the existing, dug pond would probably be filled in and allowed to revert to a more natural condition (i.e. a zone of riparian vegetation with perhaps some shallow surface water). This pond has been recently cleaned and slightly enlarged by the BLM.

The newly constructed bighorn guzzler or water catchment located about three miles west of Sand Spring in the Last Chance Range is considered a habitat improvement by the Bureau of Land Management. This guzzler would receive normal maintenance, but would be permanently abandoned if destroyed by a natural catastrophic event such as a rock slide or flash flood. This could result in a lower bighorn sheep population, especially on the east slope of the northern Last Chance Range due to the absence of water. Additional guzzlers would probably not be constructed in the parcel due to the management policy of the National Park Service. As a result, the bighorn population in the area would likely stabilize at more natural levels, and the BLM goal of 150 animals in the range as a whole may not be obtainable. At the present time the percent of the overall bighorn population that could be supported by habitat in the parcel is unknown. It is unlikely that a significant percentage of the existing population of 100 animals (Bureau of Land Management 1988) occurs within the parcel. In the absence of survey data, it is believed that about 10 bighorn presently occupy this area.

Some wildlife management activities of the California Department of Fish and Game would continue under National Park Service management. Most activities could continue as under the present or No Action situation. These include wildlife surveys such as aerial and ground census of bighorn sheep, reintroduction of native wildlife into suitable habitat under appropriate circumstances, and wildlife investigations such as the study of wildlife population dynamics, incidence of diseases, and non-manipulative research.

Guzzler construction, hunting and trapping would not be allowed. Due to this restriction the average annual harvest of six mule deer within the parcel would drop to zero. Hunting and trapping are activities considered contrary to the purposes for which national parks and monuments were established, namely the preservation the natural and cultural environment and interpretation of these values to the public.

Public lands and the wildlife found on them are the common property of all citizens of the United States. In most cases, the Federal government has chosen to manage wildlife cooperatively with State governments. The BLM has developed such a cooperative management policy with the California Department of Fish and Game. The State, though, does not "own" wildlife on Federal lands, but does have a responsibility for the wildlife. The transfer could affect the State's jurisdiction over wildlife as greater restrictions are placed on the State's management of wildlife in these areas.

Botany

Under Park Service management, as part of the Death Valley National Monument, there would be a slight positive effect on the Big and Little Sand Springs UPA and rare plant population. The exclosure of Big Sand Spring would be completed by the Park Service as planned by the BLM. All of the exclosures would be maintained, although the burro removal program might eventually preclude their necessity. The protective exclosure would not be removed until the Park Service was absolutely certain that all burros had been removed from the area (Rowlands, personnal communication).

The Park Service has indicated that eventually they would attempt to return Big Sand Spring to its original state, as it was prior to livestock grazing (Rowlands, personnal communication). This action would require the backfilling and leveling of the stock watering pond, which has recently been developed for migratory bird use. Removal of the pond would enhance the present wet meadow by a greater distribution of surface water.

Potential impacts to the Sodaville milk vetch and the UPA as a whole from mining activity would be curtailed under the stricter regulations imposed by the Mining in the Parks Act. The current millsite claim, which includes Big Sand Spring and some of the rare plant population, would be subject to a validity exam. If determined valid, the millsite claim would have little value with Park Service control of the surface water.

Any changes in grazing practices imposed by the Park Service should have no effect on the botanical resources in north Death Valley. Implementation of the proposed ACEC plan by the Bureau of Land Management has adequately protected the UPA and rare plant population within the grazing allotment.

North Death Valley may receive more public use as a part of the monument, especially with continual road maintenance. If use increases increased impacts to the UPA and rare plant population from the public, though, should be alleviated by the greater law enforcement presence afforded by the Park Service.

Livestock Grazing

Impacts to grazing would occur in two phases. The first phase would be similar to the no action alternative. This is because grazing is considered a grandfathered use. As a grandfathered use, the current grazing lease would be honored within the lifetime of the original permittee, or ten years from the date of accession, whichever occurs first. At the discretion of the NPS, an allotment management plan could also be implemented in the parcel. As a result, the short term impact of the proposed action would be minimal on the livestock use in the area.

Under the second phase (after the current lessee relinquishes the lease or he dies), livestock grazing would be eliminated from the North Death Valley parcel. Livestock grazing is considered to be noncompatible with National Park Service purposes and values and would be phased out. The implementation of this alternative would result in the following impacts on grazing:

1 Less than 100 AUMs of preference would be lost. This would result in either a cut in the livestock stocking rate or increased use on the remainder of the allotment.

2 Cattle would trespass onto the North Death Valley parcel as they move between the remaining portion of the Last Chance Allotment and the Magruder Mountain Allotment (Nevada) and as they drift south off the Last Chance Allotment.

Wild Horse and Burro

The transfer would have no effect on wild horse and burro plans for the North Death Valley parcel. The current policy of removing all burros would be continued.

Cultural Resources

While agency mission and policy may vary, both BLM and NPS are mandated to follow Federal statute and regulation in consideration of any proposed action which may impact cultural resources. For this reason, and in accordance with the provisions of a Programmatic Memorandum of Agreement among the President's Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the Bureau of Land Management, transfers of land from BLM jurisdiction to other Federal agencies are determined to have no effect on cultural resources. The transfer is regarded as an administrative action which in and of itself would not result in impacts on cultural resources.

Cultural resources are a non-renewable resource, and by their very nature are in a constant state of deterioration due to natural processes. The impacts to cultural resources normally discussed in environmental documents are those that are caused either directly or indirectly by human action. A comparative analysis of impacts on cultural resources normally discusses the relative levels of human influence on cultural resource properties.

NPS would continue BLM's program of removing wild burros from the North Death Valley parcel. Impacts on cultural resources caused by excessive burro use would lessen to a degree determined by the frequency and effectiveness of the Park Service program. Eventual removal of livestock from the area would also result in a minor lessening of livestock-related impacts on cultural resources. Regulation of mining under current NPS policy is more restrictive than similar BLM management; the concomitant decrease in mining activities would lessen potential effects on cultural resources. Impacts may occur through unrestricted public access to cultural properties, especially from OHV activity, camping, illicit collecting, and vandalism. While these activities occur on all of the parcels, no data are available on the specific level of impact on cultural resources. Due to the small amount of public use of this parcel, overall impacts would be low. Because NPS's patrol frequency would be greater than BLM would provide (three to four times per week rather than twice weekly), NPS would be more successful in controlling public access to the lands within the parcel, and impacts on cultural resources from these activities would decrease.

Lands

There would be no effect on third party authorizations (e.g. rights of ways) since none are present. Existing classifications are withdrawals which would be consistent with NPS management.

Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense (DoD) airspace users would not agree to modify the current 200-foot AGL over the transferred lands. Self imposition of a 3000-foot above ground level (AGL) floor over the transferred lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements.

The proposed action would be inconsistent with the Inyo County plan which calls for open space and multiple use management of this area.

Management Presence

The parcel would be patrolled by the Grapevine (North) Ranger District three to four times per week. This would double the frequency of patrol currently provided by BLM's expanded ranger force, and would be significantly greater than the once monthly rate of patrol that the Bureau was able to provide in the past.

Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This would not be a significant increase over time presently spent in the parcel by BLM resources staff.

Recreation

The major differences in types of recreation activities allowed on the North Death Valley parcel (BLM as opposed to NPS management) are summarized in Table 4-1. These changes would not be significant due to the relatively low visitation to the parcel. Consumptive recreational pursuits such as hunting, trapping, and rockhounding (estimated at about 500 visitor use days) would not be allowed under National Park Service management. These types of recreation would be displaced to BLM areas outside of the parcel. Recreational pursuits compatible with National Park Service managment, such as hiking and backpacking, would benefit slightly due to the lack of competition with more consumptive recreational pursuits.

Wilderness

The Saline Valley WSA (117) and Little Sand Spring WSA (119) have been preliminarily recommended as suitable for wilderness designation. These two WSAs directly border Death Valley National Monument lands that have been administratively endorsed as wilderness since December, 1974. Congressional action on the BLM and NPS recommendations would most likely be reviewed as separate actions. Until these recommendations are acted upon, any WSA lands transferred to NPS jurisdiction would be managed to protect wilderness values, subject to the Death Valley National Monument General Management Plan.

No wilderness qualities would be impaired as a result of NPS managment policies.

Geology-Energy-Minerals

General Discussion: Certain management aspects of the transfer would affect all five of the parcels in the same manner. A discussion of these follows. The discussion applies not only to the North Death Valley parcel, but to the other four parcels as well. Mining activity would be regulated under the 36 CFR 9.A regulations, resulting in the following:

a. The unavailability of the land for mineral location and entry would preclude the possibility of the discovery and development of unknown mineral resources. The overall effect would be a loss of revenue and tax base to the State and counties, increased dependence on outside sources of mineral commodities and the intensification of exploration activity on the surrounding lands.

b. Because new surface disturbance greater than that existing at the time of acquisition would not be allowed, incremental development of the mining claim could not occur. For example, if a mining claim has sufficient exploration and development to warrant a favorable validity determination, but no existing significant surface disturbance for the purpose of mineral extraction, the NPS Regional Director could not approve a plan of operation.

   The overall surface disturbance and potential surface disturbance would be reduced, but at a loss to future development and production.

c. Mandatory bonding would result in a greater degree of protection for the surface. Economic impacts to the monuments would be less should claimant/operator default and fail to perform adequate reclamation. Claimant's operating costs would increase.

Table 4-1

Comparison of Management Restrictions on Recreational Resources BLM and NPS Jurisdiction

BLM

1. OHV (licensed and "green sticker" vehicles) are allowed on existing routes not signed closed. No cross-country travel allowed for OHVs.

NPS

1. Licensed vehicles (no "green sticker" registered vehicles) are allowed on designated roads. No cross-country travel allowed.

BLM

2. Camping with vehicles is allowed within 300 feet of existing roads. No camping within 600 feet of livestock or wildlife watering sites. Camping limited to 14 days per month.

NPS

2. Death Valley has two camping zones which are clearly identified in a brochure provided to park visitors. The first zone includes areas within one mile of paved and other major roads, and areas within five miles of the designated campgrounds. Camping in this zone must be within designated campgrounds.

   The great majority of the monument falls in the second zone. Here visitors may camp in their vehicle along designated roads and/or at pull-outs as long as they are $^1/_4$ mile from a wildlife watering site. Visitors may also camp anywhere they wish to walk in the backcountry except around waterholes.

   Camping is limited to 30 days except in Furnace Creek and Mesquite Campground which are limited to 14 days.

   Within Joshua Tree, camping is allowed only in areas at least one mile from access roads.

BLM

3. Pets are allowed with no restrictions outside of developed campgrounds.

NPS

3. Pets must be on leash or physically controlled at all times. No pets are allowed beyond 1/4 mile off paved roads. No pets allowed in the backcountry.

Table 4-1 (cont)

Comparison of Management Restrictions on Recreational Resources
BLM and NPS Jurisdiction

BLM

4. Hunting, trapping and target shooting allowed under state/local restrictions.

NPS

4. No firearms, archery equipment, etc., are allowed; all such devices must be broken down and out of view while on NPS lands.

BLM

5. Rockhounding and vegetative byproduct (firewood, pinyon nuts and cones, flower blooms, etc.,) collection for personal use is allowed (firewood collected while camping must be used on site; no home use collection allowed except under special authorization sales).

NPS

5. No collection of minerals, rocks, or vegetative byproducts for personal use is allowed, except as provided by the NPS Native American Relationships Management Policy (e.g. pinyon nut collection). Scientific collection allowed under specific NPS permits.

Many smaller operators would fail to secure the necessary capital and meet the minimum financial requirements necessary in order to secure a bond. The expenditure of personal income to post a cash bond or certificate of deposit may result in additional operator costs. An operator with a break-even or slightly positive cash flow may not be able to operate at a profit.

d. The notice of intent to hold requirement would result in less surface disturbance on the claim. However, the incentive provided by the assessment requirement to pursue diligently the development of the claim would be removed. Non-disturbing types of assessment work, such as geological, geochemical and geophysical surveys could be used to further define and develop the mineral resources of the claim.

e. The transfer would affect mining claims only in cases where insufficient exploration or lack of discovery invalidate the claims.

f. Although the creation of new access would not be curtailed where the operator is working on a valid claim under an approved plan of operation, the transfer would, however, place an additional financial burden on the operator/claimant, in the form of a fee.

   This requirement differs from present management, under which the right of access across public lands is guaranteed and does not require the filing of a notice of intent or a plan of operations unless surface disturbance would occur.

g. Water use would not be allowed unless certain criteria are met. This would result, for new operations, in the inability of the claimant to develop existing water sources, resulting in increased costs for hauling and storage of off-site water.

   This would occur unless the claimant could show perfection of water right under state law, and unless he could demonstrate that the claimant's water rights are senior to the water rights of the United States or, if junior to those rights, that the use of water would not diminish the Federal right (36 CFR 9.8). Under present regulations (43 CFR 3802/3809), mining claimants have a right to use water on public lands for mining purposes. Given the arid condition of the desert, it is highly improbable that a claimant with water rights junior to the United States could show that use of the water would not "diminish the Federal right." Loss of water would be critical to operations requiring water to mine and process ore.

h. The right to appeal to the Interior Board of Land Appeals (IBLA) would be lost. Appeal of any decision by a Park Service Regional Director that is adverse to a claimant is made directly to the Director of the Park Service in Washington D.C. This appeal is the final administrative appeal and any further appeal would be to the courts (36 CFR 9.14). Under 43 CFR 3802/3809, claimants have a right to appeal decisions of the Bureau directly to the IBLA. Since IBLA decisions are binding on the Bureau, claimants who are successful in their appeal at this level would not incur any additional legal fees.

The differences between the Park Service and the BLM procedures would cause a very significant increase in overhead costs of starting and continuing mining operations in a park unit. More stringent reclamation and road charges computed on a ton-mile basis, perfection of water rights (and in most cases the cost of hauling water to a mining sites where water rights cannot be perfected), mandatory bonding, and the added legal cost of any appeal would cause such significant overhead cost increases to any operation that only the most highly mineralized areas would be profitable for mining.

North Death Valley Parcel: The potential for future development of mineral resources such as gold, silver, mercury, sulphur, gypsum, limestone, molybdenum and borates may be reduced or eliminated.

The potential loss of revenue and tax base for the County of Inyo cannot be determined at this time due to the lack of specific reserve estimates associated with the above mentioned mineral commodities.

Of particular concern is the potential loss of the strategic minerals as listed by the U.S. Bureau of Mines. In particular, there would be a potential loss of the identified strategic minerals lead and silver from this proposal.

Parcel Two: Hunter Mountain

Wildlife

Under the proposed action there would likely be enhancement of habitat conditions for wildlife due to the eventual elimination of livestock grazing, elimination of unrestricted vehicle camping along the Hunter Mountain road, greater control and regulation of mining in the area east and north of Spanish Spring, and a continuing program of burro and horse removal. Eventually, livestock grazing in the parcel would be eliminated. Mule deer population structure and perhaps density would reach natural levels through the elimination of hunting.

As a result, the Hunter Mountain ecosystem would receive some additional protection. In addition, wildlife resources, especially bighorn sheep, would be afforded more consistent, long-term protection through the elimination of livestock grazing.

Livestock grazing would be allowed to continue under controlled conditions for a considerable period of time. Typically, the National Park Service would allow cattle grazing to continue though the lifetime of the original or current lessee or until the lease privileges are relinquished, whichever occurs first. During this time wildlife habitat and populations would be enhanced over the existing situation because the following actions would likely be implemented:

1. Prevention of the drift of cattle from the parcel into Death Valley National Monument.

2. Livestock use of the parcel could not be increased, and periodic monitoring of key habitats and the ecological condition of the parcel would be conducted by BLM and NPS personnel to determine if restrictions on cattle grazing were needed to prevent unacceptable impacts to the environment.

3. New range improvements proposed for installation within the parcel would require the concurrence of the Superintendent of Death Valley National Monument.

Cattle are not indigenous to the area because they do not occur here naturally. They have been placed in this ecosystem by man. The burro is another exotic species that was introduced into the area by man.

The eventual elimination of cattle grazing in the parcel would enhance or improve the natural environment, and result in the termination or a great reduction of cattle drift into riparian and aquatic areas on the east slope of Hunter Mountain, especially in Cottonwood Canyon, all within Death Valley National Monument. In addition, cattle use of the prime bighorn sheep habitat in the lower Grapevine Canyon and Dodd Springs area would be eliminated. It is highly likely a livestock drift fence would be constructed in Grapevine Canyon, which would prevent livestock access into the parcel. The result of this would probably be reduced stress on native ungulates, reduced competition for water, elimination of water contamination by cattle excrement, and elimination of cattle trampling damage to riparian habitats.

The concern over the transmission of fatal or debilitating viral diseases to the bighorn population would be greatly reduced. Due to the potential significance of viral diseases common to cattle that bighorn can acquire, additional discussion on this subject follows. Also see an expanded discussion on this subject in Chapter 3 (affected environment).

The eventual elimination of cattle from the parcel, and probably Grapevine Canyon, may greatly reduce the potential for bighorn mortality due to diseases. According to Wehausen (1986), the incidence of two viral disease indicators in the bighorn population in the Old Woman Mountains, a desert mountain range in San Bernardino County, is the result of cattle being the reservoir of infection on a year-round basis. In addition he cites the work of other authors in stating that "...cattle commonly carry bluetongue (and presumably also its close relative epizootic hemorrhage disease) in a chronic form, with little influence on their health...". These viral diseases common to cattle are transmitted by biting gnats, and therefore overlap of bighorn and cattle distribution is not required for disease transmission (Wehausen 1986).

Eventual removal of cattle from the parcel may enhance conditions for mule deer. There is a potential for cattle to displace deer when the two animals occur in the same area (Mackie 1981, Ashcroft 1980, Nelson 1979). Current livestock practices in the parcel have the potential for causing cattle to compete with deer for spring-season forbs and grasses (Mackie 1981).

Over a long period of time, however, the absence of grazing animals (cattle and horses, primarily) in the parcel may result in the habitat becoming less desirable for mule deer (Gruell 1986). Mule deer prefer habitat with adequate browse (certain species of shrubs). Grazing animals have the ability to deplete bunchgrass from the habitat, thus favoring browse species. The degree of expected change in bunchgrass and browse is unknown as is the length of time needed for such a change to occur. However, since the present range condition of the parcel is fair (Bureau of Land Management 1980), it is likely the grasses have been significantly depleted and that grazing animals are utilizing browse species to a greater extent than if the range was in good or excellent condition.

The eventual removal of cattle and the removal of all burros and horses from the parcel would result in enhanced ecological conditions. At present, a small number of burros drift into Upper Grapevine Canyon, which is the boundary of the Lee Flat Herd Management Area. The NPS would remove all horses and burros. In 1980, the overall range condition for the Hunter Mountain Allotment, which includes parcel two, was rated as fair. Current observations show that the range condition is improving. Utilization studies conducted during the last two years document that forage utilization has dropped to light levels, even in the riparian areas. Natural habitat conditions would recur sooner due to the absence of livestock and burros.

Naturally occurring fires would be allowed to influence the area. Naturally occurring fires have the potential of enhancing wildlife habitat conditions, especially in pinyon pine and juniper forest habitats, provided they remain relatively small, do not destroy riparian vegetation, and randomly occur throughout the area. Such fires also would likely enhance habitat conditions for mule deer and bighorn sheep by allowing grasses, forbs and browse to invade openings in the pinyon and juniper forests.

The parcel likely would not contain the range improvement projects that could be installed under the no action alternative. Such projects include cattle drift fences, cattle watering troughs, water tanks, and corrals. The exact type and location of such facilities would be specified in the allotment management plan for the area. The absence of these projects may allow for more natural wildlife movements and use patterns in the parcel.

Habitat enhancement projects for wildlife, especially huntable species, would generally not be allowed, resulting in the possible "loss" of surface water for bighorn sheep at some sites due to springs becoming overgrown by dense vegetation or water being used directly by the plants through transpiration.

Burros may be responsible, in some areas, for maintaining access to surface water at springs that are required or favored by bighorn sheep. This may be the situation at Big and Little Dodd Springs (Aardahl, personal communication). However, the National Park Service may identify certain natural water sources as critical watering sites needed to maintain a viable bighorn sheep population and, therefore, allow a minimal degree of modification to maintain water for bighorn (Rowlands, personal communication).

Habitats for the slender salamander (if it occurs in the parcel) and the Panamint alligator lizard would be enhanced due to the eventual elimination of cattle and burros from riparian areas such as Grapevine Canyon. At the present time the degree of impact on these habitats has not been quantified, but evidence of trampling by cattle and burros exists.

Conditions for other species such as the Panamint kangaroo rat, raptors and upland game birds may or may not change. Little is known about these species on the parcel. The habitat for these species would be enhanced by management under the proposed action. One potential use that could have a significant effect on these species, as well as others, is mining. This could include vehicle use, drilling and blasting, ore removal and milling, and on-site residences. Mining uses would be regulated to a greater degree and, therefore, would be less impacting on the habitat in general.

For the effect on wildlife management programs of the CDFG refer to the analysis of parcel one.

Livestock Grazing

Impacts on grazing would occur in two phases. The first phase would be similar to the no action alternative. This is because grazing is considered a grandfathered use. As a grandfathered use, the current grazing lease would be honored within the lifetime of the original permittee, or ten years from the date of accession, whichever occurs first. The draft Hunter Mountain Allotment Management Plan could be finalized and could, at the discretion of the NPS, be implemented in the parcel. As a result, the short term impact of the transfer would be minimal. Resource conflicts around riparian areas and cattle encroachment onto the existing DVNM may continue because structural range improvements may not be constructed to support a grazing use that is being phased out.

Cattle use could be eliminated from most of the remainder of the allotment, depending on whether or not the NPS would authorize continued diversion of water through the Hunter Mountain Pipeline (see below).

Under the second phase (after the current lessee relinquishes the lease or he dies), livestock grazing would be eliminated within the Hunter Mountain parcel. Livestock grazing is considered to be incompatible with NPS purposes and values and would be phased out. The implementation of this alternative would result in the following impacts on grazing:

1. About 450 AUMs of forage would be lost. This would result in either a cut in the stocking rate or increased use on the remainder of the allotment.

2. Cattle would trespass onto the Hunter Mountain parcel unless a fence is constructed along the boundary in Grapevine and Mill Canyons. Such a fence would be approximately eight miles long and cost around $40,000.

3. Cattle use could be eliminated from the allotment depending on whether or not the NPS would authorize continued diversion of water through the Hunter Mountain Pipeline. The Park Service has indicated that water diversions (such as the Hunter Mountain Pipeline) would continue to function and that the permittee would be allowed to maintain the pipeline. In that case, there would be no water-related impacts on the Hunter Mountain allotment.

   If the permittee is not allowed to maintain the pipeline and its source, then the only permanent sources of water in the remaining part of the allotment would be eliminated. This would eliminate grazing on the Hunter Mountain Allotment. The permittee acquires approximately 40 percent of his total forage needs from the Hunter Mountain Allotment. Alternate grazing areas are not available in the Owens Valley area; thus, the permittee would have to cut his herd down (probably about 50 percent) to match the carrying capacity of private lands and leases. The permittee has stated that a cut of this magnitude would destroy the his entire livestock operation because it would cease to be an economic operation.

Wild Horse and Burro

The transfer would have an impact on wild horse and burro plans for the Hunter Mountain parcel. Under current management plans, burros located in upper Grapevine Canyon are part of the Lee Flat Herd Management Area and are slated for retention. Under NPS plans, all of the horses and burros found on NPS lands could be removed. Wild horses and burros on the remainder of the parcel are slated for removal. Under NPS jurisdiction there may a change in the way burros are removed as the NPS is not constrained by the Wild Horse and Burro Act. Removal options the NPS has used include capture and direct reduction (i.e. shooting).

Cultural Resources

The impacts on the Hunter Mountain parcel would be identical to the discussion for parcel one with the following exceptions. In addition to burros, the continued removal of wild horses from the parcel would result in a minor lessening of impacts on cultural resources through trampling.

Collection of pinyon nuts by Native Americans for personal use or consumption will continued to be allowed on Hunter Mountain (Hopkins, personal communication). Further, persons other than Native Americans may also collect pinyon nuts. The Park Service's Native American Relationships Management Policy states the following:

> "In accord with 36 CFR 2.1(c)(1) the Superintendent may designate certain fruits, berries, nuts or unoccupied seashells that can be gathered by hand for personal use of consumption upon a written determination that the gathering will not adversely affect park wildlife, the reproductive potential of a plant species, or otherwise adversely affect park resources."

The policy further states that the Superintendent shall provide reasonable access to Native Americans for the pursuit of religious activities to the extent permitted by provisions of NPS Management Policies on Religious Activities VII-18 and Public Assembly VII-21 to 23.

The Park Service, therefore, would not restrict access for the purposes of traditional use. Gathering by non-mechanical means for personal consumption would still be allowed under NPS management. One particular concern, however, has been the methods used to travel to pinyon harvesting areas. There is a possibility that the Park Service would limit vehicular use more severely than does BLM. In this sense access, while permitted, could become more difficult.

Lands

With the exception of Inyo County's possible interest in the east-west dirt road, there would be no impact on third party authorization since there are none. The road in question could not be enlarged. Existing classifications are withdrawals which are consistent with NPS management.

Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense airspace users would not agree to modify the current 200-foot AGL over the transferred lands. Self imposition of a 3000-foot AGL floor over the transferred lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements.

The proposed action would be inconsistent with the Inyo County plan which calls for open spaces and multiple use management of the area.

Management Presence

The parcel would be patrolled by the Grapevine (North) Ranger District two to three times per week. The patrol would probably be by the monument's current Racetrack Valley patrol, and would enter the parcel from the east by way of the Hunter Mountain road. This would be about the same as the frequency of patrol currently provided by BLM's expanded ranger force, although it would be somewhat greater than the once weekly rate of patrol that the Bureau was able to provide in the past.

Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This would be about the same frequency as presently provided by BLM resources staff.

Recreation

Long-term recreational use of the Hunter Mountain parcel would definitely change under NPS managment. The loss of about 1,500 visitor use days of hunting and rockhounding would be the most severe impact on recreation (total recreation use estimated at 2,800 user days). The major differences in the types of recreation activities that would be allowed on the Hunter Mountain parcel by BLM and NPS are summarized in Table 4-2.

It is not known what impact NPS management would have upon the vehicle access in the Hunter Mountain parcel. No official NPS plans exist for the BLM portion of Hunter Mountain. Some primitive campsites accessible by vehicle might be allowed. The development of a primitive campground in the area would be in keeping with the DVNM General Plan's emphasis on providing more higher elevation camping opportunities for summer time visitors (page 36, DVNM General Plan).

Wilderness

The impacts on wilderness study areas if the two BLM WSAs were to transfer to NPS jurisdiction would be the same as for the North Death Valley parcel.

Geology-Energy-Minerals

The transfer of this area to Park Service management would cause significant negative impact on future mineral exploration or development of the area. Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. A general discussion of these impacts can be found in the GEM analysis for parcel one.

In addition to the effects of transfer previously discussed, the potential for future development of mineral resources such as gold, silver, lead, zinc, molybdenum, copper, limestone and wollastonite may be reduced or eliminated. Of particular consequence is the potential loss of the strategic minerals copper, lead, silver, and zinc that have an identified potential for occurrence in the Hunter Mountain parcel.

In 1985 Moore and Tabor drilled five exploratory drill holes for NYCO, a major wollastonite producer in New York State on the Hunter Mountain wollastonite (J.O. property claims). Detailed results of the drilling program are confidential, but, in general, two million tons of proven reserves of 85 to 90 percent wollastonite ore were identified during the drilling program (Don Clark, Tabor & Moore, personal communication, 1988). NYCO dropped the options on the property due to the adverse environmental climate. According to Mr. Clark NYCO had examined a dozen properties worldwide and found the resource at the Hunter Mountain deposit to be an order of magnitude better than any other evaluated.

A deposit with a proven reserve base of two million tons and an inferred reserve base of 200,000,000 tons of 60 to 85 percent wollastonite is a world class deposit. Over the long term, the potential economic increase in the Inyo County tax base which would not be realized if the Hunter Mountain deposit were not developed would exceed $20,000,000 (1985) worth of product. Because wollastonite fires as a porcellan glaze at a much lower temperature than conventional silica glazes currently used, the energy savings from the use of this mineral as a glaze would be lost, in addition to the potential loss of economic dollars related to development of the wollastonite deposits at Hunter Mountain.

Parcel Three: Pyramid Peak

Wildlife

While it could be argued the reduction in grazing and mining would reverse bighorn population losses, the historic decline in bighorn numbers within the DVNM does not support such a conclusion. Should anything catastrophic happen to the Pyramid Peak bighorn guzzler it would not be repaired or replaced.

Under this scenario the lack of water would render a large area of bighorn habitat unusable, and it can reasonably be inferred that this would lead to further population declines.

The effects on common wildlife species and their habitats are expected to be inconsequential.

Botany

The effects of adopting this proposal would be slight in the short term. Management of sensitive botanical resources within DVNM and outside is essentially the same. Over the long term, management under the jurisdiction of DVNM would result in some positive effects on botanical resources. Impacts that could have resulted in surface disturbance from actions authorized by BLM under the general land laws and mining laws would not occur.

Cultural Resources

The discussion of potential impacts on cultural resources anticipated under Alternative A is the same as the discussion for parcel one, except that livestock use and burros are not factors in the Pyramid Peak parcel.

Lands

If the transfer results in any modifications of the Death Valley National Monument Draft General Management Plan (GMP), the Park Service would likely prescribe acquisition of State and private lands. Specific acquisition priorities and methods would be identified in a "Land Protection Plan" supplement to the General Plan. Although U.S. Borax maintains high interest in it's Travertine Point property (particularly if relocated as indicated in the exchange proposal), it is expected to be a high acquisition priority for NPS. Acquisition of the property would prevent development and thereby would protect the scenic viewshed to the north of State Highway 190, a major monument visitor entryway. Although a lesser priority, State lands would likely be incorporated into a future BLM-State land exchange.

There would be no effect on any rights-of-way or other authorized surface uses. State Highway 190 would not be modified or otherwise affected. Any future linear rights-of-way needs would not be available within the parcel, but could be considered south of the highway.

Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense airspace users would not agree to modify the current 200-foot AGL over the transferred lands. Self imposition of a 3000-foot AGL floor over the transferred lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements.

NPS management would be inconsistent with applicable Open Space elements of the Inyo County General Plan. Wilderness management would be significantly more prohibitive and restrictive on land uses than the Inyo County "Natural Resource Lands" prescription of multiple land use.

Management Presence

The parcel would be patrolled by staff from monument headquarters at Furnace Creek. The frequency of patrol would not exceed that provided by BLM's expanded ranger force. Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This would not be a significant increase over time presently spent in the parcel by BLM resources staff.

Wilderness

Existing wilderness values would be maintained. The draft general management plan for DVNM indicates that all adjacent monument lands have been included within the wilderness recommendation for DVNM that is currently before Congress. All roads crossing those adjacent lands have been closed. Assuming that the same management would apply to the adjacent parcel, the Pyramid Peak unit would be included in its entirety in the DVNM's wilderness recommendation. Until official designation, it would be managed as an administratively endorsed wilderness.

Parcel Three includes a portion of the Funeral Mountains WSA that is not recommended for wilderness designation by BLM. However, this portion of the WSA would be recommended as wilderness by the Park Service if the parcel is transferred.

The BLM and NPS each have a different policy regarding the management of wilderness. Both policies, however, meet the goals of and comply with the Wilderness Act of 1964. The differences between these policies are discussed, if applicable, within the particular section for the affected resource.

Recreation

Long term recreational use patterns would not change if the parcel is transferred to DVNM. This parcel would be managed for preservation of its wilderness values. Only non-motorized types of recreational uses would be allowed to continue. The existing access route in Red Amphitheater would be closed. BLM's wilderness recommendation would also close this route.

Parcel three would continue to serve primarily as a scenic backdrop to visitors on State Route 190 as they begin to descend to monument headquarters at Furnace Creek.

Recreational hunting would not be allowed. The impact would be minimal, as there is little or no hunting within the parcel at the present time.

Geology-Energy-Minerals

The transfer of this area to Park Service management would cause a moderate negative impact on future mineral exploration or development of the area. Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. A general discussion of these impacts can be found in the GEM analysis for parcel one.

If the proposed alternative is implemented, it would have little or no effect on the development of sand and gravel, limestone, dolomite, silica, clay and zeolite and an unknown effect on the development of possible borate resources over the next 15 or 20 years. This parcel has not been core drilled to any extent.

Adequate reserves of sand and gravel are located southeast of parcel three, both north and south of Highway 190. Large hypothetical reserves of carbonate and silica resources are also located outside of the parcel in the southern Resting Spring Range (south of Highway 178). Most of the moderate potential zone for clay and zeolite lies in a Class L area northeast and outside of parcel three. The southern part of the parcel has not been drilled yet, so the quality and quantity of borates there, if any, is not known. Borate occurrence are known two miles to the west and two miles to the south (McAllister, 1970).

Under BLM management, 80 percent of parcel three is recommended for inclusion in the National Wilderness Preservation System. If it were designated wilderness, validity exams would be conducted, and it would be closed to further mineral entry. Regarding the BLM multiple use class M portion of parcel three (the 20 percent which the BLM recommends as nonsuitable for wilderness), the consequence of mine closure or the precluding of the development of domestic mineral deposits is a loss of jobs and tax base, and the overseas transport of these items and our technology and dollars to purchase the needed commodities.

About 500 acres of the Class M area in parcel three has moderate potential for the occurrence of borates. It is anticipated that within the next 15 or 20 years a plan of operations for borate exploration drilling would be precluded because the area would be withdrawn from mineral entry under Park Service management. Geologic inference indicates that possibly 100,000 tons or more of 25 percent B_2O_3 borate resources valued at one million dollars or more would remain undiscovered in what is presently the BLM class M portion. Mining would be open pit, underground, or solution mining depending on the depth of the deposit. Economics of open pit mining would be severely effected due to higher standards for reclamation in National Park Service managed areas. The economic conditions may be so changed as to render the area uneconomic.

Parcel Four: Greenwater Valley

Wildlife

Current bighorn management would not change significantly. However, future management options would be restricted. Since the Park Service places such an extremely low priority on habitat enhancement (such as guzzler construction), the possibility of a bighorn reintroduction, at any future date, is low. This would reduce the overall amount of bighorn habitat, statewide, that the CDFG has to work with in it's efforts to restore bighorn herds to their historic ranges.

Botany

Impacts are similar to those described in Alternative A: Parcel Three.

Cultural Resources

The discussion of potential impacts on cultural resources anticipated under Alternative A is the same as the discussion for parcel one, except that livestock use and burros are not factors in the Pyramid Peak parcel.

Lands

NPS land acquisition priorities within this parcel would be low, since this area is not within the central or main valley area. It is not known what specific methods of acquisition, if any, would be identified in a future Land Protection Plan. State lands would likely be acquired on an opportunistic basis, probably included in a large BLM-State land exchange.

Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense airspace users would not agree to modify the current 200-foot AGL over the transferred lands. Self imposition of a 3000-foot AGL floor over the transferred lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements.

Since material sites rights-of-way LA-0164240 and R-1483 and electric distribution line rights-of-way R-06979 are on the parcel periphery, immediate attempts of phase-out are not anticipated. Interior electric distribution line rights-of-way R-01247 and R-316 would likely be identified for short-term phase-out, since the mines they served are closed. There would be no modification or other effects on the rights-of-way for State Highways 127 and 178. Approximately one-half mile of Inyo County Road 5005 (within Section 6, T.21N., R.6E., SBM and Section 31, T.22N., R.6E., SBM) may be closed. The Lost Section Road would probably remain open, since the existing adjacent portion of the monument is a designated backcountry camp area, with a continuation of this road (open 4-wheel drive route).

NPS management would be inconsistent with applicable Open Space elements of the Inyo County General Plan. Wilderness management would be significantly more prohibitive and restrictive on land uses than the Inyo County "Natural Resource Lands" prescription of multiple land use.

Management Presence

The parcel would be patrolled by a ranger based in Shoshone. Frequency of patrol would be a minimum of twice a week. Thus, the frequency would not increase--and could decrease slightly--from the present daily patrols provided by BLM's expanded ranger force (although it would be significantly higher than the presence provided by BLM prior to the ranger expansion).

Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This would be a significant increase over time presently spent in the parcel by BLM resources staff.

Wilderness

Wilderness characteristics in the long term would be enhanced. Based upon the management goals in the draft GMP and EIS for DVNM, virtually the entire parcel (with the exception of existing well-used routes of travel) would be included within the 1974 wilderness recommendation for DVNM that is currently before Congress (under the No Action alternative, about 20 percent would become designated wilderness).

Wilderness values would remain unchanged in the short term if transferred to DVNM. Upon transfer to the monument (and until official wilderness designation), the portion of the area that is eligible for wilderness designation would be managed as administratively endorsed wilderness. If the parcel were to remain with BLM, the lands within the Greenwater Valley and Ibex Hills Wilderness Study Areas would be managed under BLM's interim management policy until official designation. The administrative endorsement within DVNM is as restrictive as the IMP. Both the administrative endorsement and the IMP allow for a multitude of uses within wilderness study areas as long as impacts are not substantially noticeable in the area as a whole.

After official designation, certain recreational activities (that are permissible in BLM wilderness) are not allowed in National Park wilderness. These include hunting, rock collecting, and trapping. Current use levels of these activities are low.

Recreation

Recreational uses of parcel four would not change appreciably. Including this parcel within Death Valley National Monument would draw special attention to it. However, due to it's location on the outer fringes of the monument, use levels would remain low.

Backcountry off-highway vehicle access would continue to be available, primarily in the northern and southeastern portions. Some existing open routes may be closed, however, based upon specific management goals of the monument. In addition, the BLM permits vehicle use within some desert washes; NPS would not allow such use.

The northern tip of parcel four contains the Greenwater Mining District. There are several access routes in this area. The accessibility of the area to the general public would remain very limited, however, because it can be reached by four-wheel-drive roads only. The major access routes in the southern portion of the parcel would also most likely remain available for vehicular use. Because these routes are close to State Route 127, use would remain at current levels.

The GMP proposes to locate a campground immediately west of parcel four, within Rhodes Wash in the monument. The GMP also indicates that the county claimed road in the central portion of the parcel would be excluded from wilderness designation. The road and campground would increase accessibility and serve as departure points for primitive types of recreation. However, extreme temperatures and lack of available water would limit such uses to one or two day hikes.

Geology-Energy-Minerals

The transfer of this area to Park Service management would cause significant negative impact on future mineral exploration or development of the area as a whole. Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. A general discussion of these impacts can be found in the GEM analysis for parcel one.

The transfer would have little or no effect on the development of mineral resources in the northern part of the parcel, but would have a negative impact on the development of precious metals, talc and sand and gravel in the southern one third of the area. There would be an unknown effect on borate resource development since their potential occurrence is unknown in the alluvium covered valley.

Concern has been raised over the removal of lands from mineral entry without adequate studies, which should include detailed geochemical analysis, drilling, and testing (Johnson, 1988). For example, regarding the 28 square miles having speculative resources of copper in the northern half of the area, a State report had this to say: "It may be sufficient to justify the cost of a preliminary geochemical investigation to determine the extent of the association of copper with the monzonite or with the rhyolitic intrusive rocks, and geophysical prospecting to extend the gravity anomaly and to determine the depth of fill over monzonitic rocks in Greenwater Valley" (Taylor, 1986, p. 41).

The following discussion on impacts is restricted to areas of high mineral development potential.

About $1^1/_2$ square miles near the Rusty Pick mine (southwest corner of Parcel Four) and under BLM multiple use class M has high potential for the development of talc. It is anticipated that at least one talc mine would be precluded based on a past mining proposal. This would result in the loss of up to 10,000 tons of talc worth $500,000. In the second high potential talc area, Ibex Hills, it is likely that one operation at least twice as large as the deposits near the Rusty Pick mine would be precluded. This is because of the more numerous talc occurrences.

The large, high potential zone for precious and base metals would probably produce at least one small gold mine over the next 10 years if left under multiple use management. Values not recovered because of the transfer may approach 10 to 20 million dollars over the next 10 to 20 years.

The potential for metallic mineral development near the Rusty Pick mine is low over the next 15 to 20 years due to the low price of silver and base metals and the fact that the Rusty Pick mine is on State land.

The potential for the development of bentonite is low over the next 15 to 20 years. It seems probable that the existing pit east of the parcel can supply the anticipated demand for the foreseeable future.

The two Caltrans material sites would be extinguished by relinquishment or condemnation. Therefore, an estimated 500,000 cubic yards of sand and gravel would no longer be available from these sites for the maintenance of Highway 127. The United States would be required to compensate Caltrans for the cost of obtaining aggregate elsewhere.

Sand and gravel are a Group IV commodity, of local and regional importance. However, they are not major minerals of international commerce (Horton, 1983, p. 2) and are not one of the 75 minerals in the strategic and critical stockpile. The probable level of demand is forecast to grow at an average annual rate of two percent to the year 2000. In 1987 construction sand and gravel output increased two percent. Shortages in urban and industrialized areas are expected to continue to increase due to local zoning regulations and land development alternatives. Shortages for highway use may result from nonimpairment requirements for wilderness study areas.

It is unlikely that geothermal energy would be developed in the parcel within the next 15 to 20 years because of the sparse population.

Parcel Five: Pinto Basin

Wildlife

At present, 4,000 acres of a desert tortoise concentrations area centered in the monument are administered by BLM. The transfer of the Pinto Basin parcel to the Joshua Tree National Monument would bring half of those 4,000 acres into the monument. OHVs occasionally travel cross-country in the parcel. Because the frequency of ranger patrol would increase in this area, the portion of the population that would be transferred would benefit slightly from the reduction of OHV use.

There would be no impact on desert bighorn sheep.

Botany

Since the use of the parcel would most probably be primitive wilderness hiking and backpacking, the transfer is not expected to affect any potential population of either the foxtail cactus or the California snakebush.

Livestock Grazing

The vegetation of the parcel is not suitable for grazing, and therefore no provisions were made to create grazing allotments in this area in the CDCA Plan. There is no known future need of the parcel for grazing, and therefore no effect is expected from the transfer.

Cultural Resources

The discussion of potential impacts on cultural resources would be the same as the discussion for parcel one, although livestock and burros are not factors in this parcel.

Lands

No land actions exist within this area, and so none would be affected by the proposed transfer to the Park Service. This area is presently classified in the California Desert Plan as a limited use area. This type of land use does not differ greatly from the use that would be allowed by the Park Service should the transfer be consummated.

Management Presence

The parcel would be patrolled by rangers once or twice per week during the high use season (October through May), a rate that would drop to three to four times per month during the summer. This would be a significant increase over the presence provided by BLM's ranger force, which rarely enters the parcel. Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This also would be a significant increase over time presently spent in the parcel by BLM resources staff.

Recreation

The transfer of this 4,480 acre parcel to the NPS would mean that activities such as OHV use, roadside camping, shooting, hunting and rockhounding would be eliminated. However, the resultant change from the current situation would be be slight. The area has very few vehicle routes of travel, and does not attract much general recreation use.

Management for primitive recreation would have a positive effect on hiking, backpacking, and other non-motorized or vehicle dependent activities. The parcel's location (it adjoins existing wilderness) would enhance the quality of experiences for these primitive, non-confined recreation uses.

Wilderness

Although none of this former WSA was recommended as suitable for wilderness designation, the wilderness values that were identified would be protected. Wilderness management of this area would enhance wildlife habitat by providing another area of restricted human activities. Because the adjacent monument lands are recommended for wilderness designation, and because of the lack of developments in this parcel, it is likely that it will be recommended as suitable for designation as wilderness by the Park Service. Therefore, wilderness qualities would not be impaired.

Geology-Energy-Minerals

Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. A general discussion of these impacts can be found in the GEM analysis for parcel one.

There would be few impacts on mineral resources. Only a small portion of the Pinto Basin has a moderate potential for copper, gold, and lead (map 3-8). As of December 1987 only two mining claims were located in this area. Since development of the two small moderate potential areas is improbable at this time, closing the area to mineral entry will have only negligible impacts on socioeconomic conditions in Riverside County.

MODIFIED ALTERNATIVE A: BLM/NPS PREFERRED

Parcel One: North Death Valley

The impacts for wildlife, botany, cultural resources, lands, management presence, wilderness, recreation, geology-energy-minerals would be the same as the Preferred Alternative in the DEIS. Under this alternative, approximately 5,000 acres in the northwestern corner of the North Death Valley parcel would not be transferred. This area, primarily class M, contains the highly mineralized area around Crater. Its exclusion would prevent the inclusion of an area with a large number of developments and other intrusions into the monument, and would allow the continued development of mineral resources near Crater. The modified boundary is indicated on map 2-1.

The existing bighorn sheep guzzlers located west of Sand Spring will also be maintained by NPS unless demonstrated that facility is no longer needed to maintain the bighorn sheep population.

Parcel Two: Hunter Mountain

Since this parcel would be retained in the CDCA, the impacts for wildlife, botany, cultural resources, lands, management presence, wilderness, recreation, geology-energy-minerals would the same as described for Alternative E, Parcel Two. The development and implementation of a cooperative management plan between the Bureau and Park Service (Appendix G) to deal with cattle trespass, poaching and illegal hunting, and management will further reduce these impacts. This modification to Alternative A, the preferred alternative in the DEIS, eliminates impacts to minerals and grazing. By retaining public ownership, continued mineral exploration and potential development of the wollastonite deposit will be permitted, and grazing will continue for the foreseeable future.

Parcel Three: Modified Pyramid Peak

The impacts for this parcel are, for the most part, the same as Alternative A of the FEIS. As a specific mitigation measure for this parcel, as outlined in Appendix G, the existing bighorn guzzlers located on the parcel will be maintained by NPS unless demonstrated that the facility is no longer needed to maintain the bighorn sheep population.

Parcel Four: North Greenwater Valley

The impacts to botany, lands, management presence, wilderness and recreation would the same as Alternative E, the No Action Alternative.

Wildlife

The impacts on bighorn sheep habitat would the be the same as Alternative E, the No Action Alternative. Future management options may be improved under BLM retention.

Cultural Resources

The impacts would be the same as in Alternative E, the No Action Alternative, except only the historic Greenwater Mining site would be involved, and the 10 recorded archaeological sites would be retained by the BLM.

Geology-Energy-Minerals

The impacts essentially would be the same as in Alternative E given the moderate potential for gold, silver, copper and barite and their low potential for development.

Parcel Five: Modified Pinto Basin

Impacts on wildlife, botany, cultural resources, lands, management presence, wilderness, recreation and geology-energy-minerals would be as described by Alternative A, Parcel Five.

ALTERNATIVE B:
MODIFIED GREENWATER VALLEY PARCEL

Impacts on wildlife, botany, cultural resources, and management presence would be as described for Alternative A: Greenwater Valley Parcel.

In general, there would be relatively little difference in the effects of a transfer between this alternative and the proposed action, with one exception. That exception concerns minerals. Fifty percent of the area of high potential for precious and base metals (in the Ibex Hills) would continue to be available for mineral development. Two areas with a high potential for sand and gravel, and a large area with moderate potential for geothermal energy development, would remain outside the parcel.

Lands

Impacts would be the same as those described for Alternative A: Parcel Four with the following exceptions. The non-federal land acquisition effort would be slightly reduced. Nearly all existing rights-of-way phase-out efforts would be eliminated. Monument boundary identification and management effectiveness would be reduced compared to alternative A

Wilderness

Wilderness values would be maintained to a lesser degree than Alternative A: Parcel Four. The portion of Alternative A: Parcel Four which would not be transferred under Alternative B because of high mineral values would remain available for multiple uses other than wilderness.

Recreation

The effect upon recreational use would be similar to the proposed action, although it would be somewhat more positive for motorized vehicle recreation than the proposed action in the eastern Ibex Hills. This is because that area would remain available for off-highway vehicle use.

Geology-Energy-Minerals

The transfer would have little or no effect on the development of barite, copper, and silver resources in the northern two thirds of the area within the foreseeable future.

About $1^1/_2$ square miles near the Rusty Pick mine (in the southwest corner of the modified Greenwater Valley parcel) and under BLM multiple use class M has high potential for the development of talc. It is anticipated that at least one talc mine would be precluded based on a past mining proposal. This would result in the loss of up to 10,000 tons of talc worth $500,000. In the second high potential talc area, Ibex Hills, it is likely that one operation at least twice as large as the deposits near the Rusty Pick mine would be precluded. This is because of the more numerous talc occurrences.

About 50 percent of the large, high potential zone for precious and base metals would not be transferred. Therefore, there is a low to moderate possibility that this area could produce at least one small gold mine over the next 10 years since it would be left under multiple use management. Values not recovered because of the transfer may approach 5 to 10 million dollars over the next 10 to 20 years.

The potential for metallic mineral development near the Rusty Pick mine is low over the next 15 to 20 years due to the low price of silver and base metals and the fact that the Rusty Pick mine is on State land.

The potential for the development of bentonite is low over the next 15 to 20 years. It seems probable that the existing pit east of the parcel can supply the anticipated demand for the foreseeable future.

The two Caltrans material sites would be outside of the modified parcel boundaries, and could continue operating. Therefore, an estimated 500,000 cubic yards of sand and gravel would continue to be available from these sites for the maintenance of Highway 127.

It is unlikely that geothermal energy would be developed in the parcel within the next 15 to 20 years because of the sparse population.

ALTERNATIVE C:
EAGLE MOUNTAINS

This alternative differs significantly in certain areas from the proposed action. In particular, mineral development near the Black Eagle mine would be curtailed. Additional restrictions on recreation access would be imposed. However, the entirety of the BLM portion of a Desert tortoise concentration area would be transferred to the monument, which would not incur under the proposed action.

Wildlife

At present, 4,000 acres of a desert tortoise concentrations area centered in the monument are administered by BLM. The transfer of the Eagle Mountains to the Joshua Tree National Monument would bring the entire concentration area into the monument. Given the greater frequency of ranger patrol, the portion of the population that would be transferred should benefit from the reduction of OHV use.

The transfer would have both beneficial and detrimental impacts on desert bighorn sheep. On the positive side the transfer would effectively eliminate loss of habitat from mining activity. Conversely, the transfer would also mean foregoing the enhancement of potential mountain sheep habitat with artificial watering sources. At this time only the area around Buzzard Spring and Eagle Tank can be considered watered sheep range (9,000 acres or 44 percent). The remaining 56 percent of identified potential mountain sheep range proposed for exchange is water-deficient.

Botany

Since the use of the parcel under NPS management would most probably be primitive wilderness hiking and backpacking, the transfer is not expected to affect any potential population of either the foxtail cactus or the California snakebush.

Livestock Grazing

The vegetation of the parcel is not suitable for grazing, and therefore no provision were made to create grazing allotments in this area in the CDCA Plan. There is no known future need of the parcel for grazing, and therefore no effect is expected from the transfer.

Cultural Resources

The discussion of potential impacts on cultural resources would be the same as the discussion for parcel one, although livestock and burros are not factors in this parcel.

Lands

The bulk of the areas classified in the California Desert Plan for M and I management are affected by mining interests. This type of land use directly conflicts with the proposed Park Service management as a National Monument. The two rights-of-ways issued to Kaiser Steel Corporation would not be affected by the transfer. The rights-of-ways were issued for an indefinite term, and therefore they are valid until Kaiser no longer wants them, whether the area is under the administration of the BLM or the Park Service.

Park Service management would be consistent with the Riverside County Plan, except for those areas devoted to mineral development and/or exploration.

Management Presence

The parcel would be patrolled by rangers once or twice per week during the high use season (October through May), a rate that would drop to three to four times per month during the summer. This would be a significant increase over the presence provided by BLM's ranger force, which rarely enters the parcel. Resources staff specialists likely would visit the parcel for spring surveys once per year, and at other times on an as needed basis. This also would be a significant increase over time presently spent in the parcel by BLM resources staff.

Recreation

Under NPS management, recreational use patterns would change significantly. Opportunities for vehicle-dependent activities would be severely curtailed or completely eliminated. Non-motorized, primitive forms of recreation would be enhanced and would grow.

Access into the parcel would be limited to the Black Eagle Mine Road. About six miles of this road (between the current monument boundary and a locked gate at a public/private land boundary) would remain open to the public. All other vehicle trails and ways in the parcel would be closed. This limited access combined with road closures would significantly reduce the attractiveness of the area to OHV touring.

Other activities would be eliminated. Monument regulations would prohibit roadside camping, hunting, shooting and rockhounding.

Opportunities for hiking, backpacking and other primitive, non-motorized uses would be enhanced. These activities would benefit from both a lack of competition for available space and the elimination of non-conforming recreation uses. Hiking and backpacking levels would increase. The overall use would remain low in the future, however, due to the area's remoteness and the need for a four-wheel-drive vehicle to access the area.

Wilderness

All wilderness values would be protected. Wilderness management of the northern portion of the WSA would enhance bighorn sheep habitat and other special resource values by restricting uses. Under the original plan, this area was identified for intensive use.

Wilderness designation of this WSA would also enhance the bighorn sheep and desert tortoise habitats and protect the sensitive plant species and cultural resources found in the area.

No wilderness qualities, either in the portion added to the monument or in those portions remaining in the BLM Eagle Mountain WSA, would be degraded.

Geology-Energy-Minerals

The transfer of this area to Park Service management would cause significant negative impact on future mineral exploration or development of the area. Under Park Service management minerals would no longer be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802 but under the more restrictive measures of 36 CFR 9.A that are the Park Service's regulations for mining in a park or national monument. A general discussion of these impacts can be found in the GEM analysis for parcel one.

The Eagle Mountains alternative would cause significant impact on both mineral resources and the potential and planned development of those resources. The portion of the alternative that lies inside the Eagle Mountain WSA has been classified as having a high to moderate potential for metallic mineral resources by the USGS and the BOM in Open File Report 84-631 (1984). Under Park Service management these mineral resources would be removed from location under the mining law and operations with vested rights would be impacted economically because of higher restoration and mining costs required by the Park Service.

The portion of this alternative on the non-WSA CDCA lands has a known history of mining on patented and unpatented mining claims. A large portion of the Kaiser Steel Mine and large numbers of unpatented mining claims would be adversely affected by the transfer. Since Park Service regulations apply equally to private and public lands, the known mineral resources on patented mining claims at the Kaiser mine would be equally impacted.

The transfer may also preclude significant beneficial socioeconomic impacts. Since the closure of the Kaiser Iron Mine the Desert Center area has become economically depressed. Planned development by Kaiser Steel Corporation would help to revitalize the economy of the eastern side of Riverside County through the creation of new jobs. Planned development would also generate significant revenue for the county and the local area.

ALTERNATIVE D:
MODIFIED PYRAMID PEAK PARCEL

Impacts on wildlife, botany, cultural resources, lands, management presence, recreation, and geology-energy-minerals would be as described by Alternative A: Parcel Three.

Impacts on wilderness are similar to Alternative A: Parcel Three. However, transfer of the additional acreage to DVNM results in a more definable boundary between BLM and DVNM. In addition, wilderness manageability of the balance of the Funeral Mountains WSA, which would remain with BLM, would be enhanced. This is because the Funeral Mountains WSA would retain a more compact, manageable shape. The original NPS proposal left a long, narrow strip of BLM wilderness extending to the north of the body of the WSA. Alternative B transfers this strip to the Park Service. The additional area would neither enhance nor degrade the manageability of the transfer parcel, while it's transfer would ensure the adjacent BLM wilderness's manageability.

ALTERNATIVE E: NO ACTION

Parcel One: North Death Valley

Wildlife

Under the CDCA Plan, the habitat conditions at Sand and Little Sand Spring would improve under the designation as an Area of Critical Environmental Concern (ACEC)(map 3-1), but implementation of the appropriate protective actions to achieve the desired level of protection may occur at a slower rate than if the area were managed by the National Park Service. Degradation of Sand Spring may occur due to mining or mining-related activities. The most likely use of the area would be for millsite activities involving the diversion and use of surface water. A millsite claim was filed at Sand Spring in 1981 to use the water for drilling at claims to the northeast, and for a gold recovery operation. A considerable amount of riparian and aquatic habitat at this site is outside the boundary of the wilderness study area and, therefore, is not afforded the mandatory protection of lands under wilderness review.

Upon completion of the plan for the ACEC at Sand and Little Sand Spring, the Bureau would construct a protective fence around the aquatic and riparian habitats at Little Sand Spring. The pond at Sand Spring would be maintained and completely fenced to exclude burros and cattle. A water source, using water from the pond, would be developed outside the fenced area to provide water for drifting cattle and burros, and for occasional bighorn if they happen to seek water at the site. Such a water source is necessary to prevent horses and burros from damaging the protective fence in their attempt to obtain drinking water.

Burros would eventually be removed from the entire area through live-trapping at the water sources. The probable date for "total" removal is not known at this time, but could occur within the next several years (the last burro live-trapping at Sand Spring occurred in 1981). This would be effective in protecting the springs, but only if BLM removal efforts are frequent and effective enough to keep out burros. Should burros be effectively eliminated from these two springs, burro use of adjacent mountainous habitat in the Last Chance Range would be greatly reduced, as would drift into the present monument (especially in the Grapevine Springs area).

Botany

The ACEC Plan for Big and Little Sand Springs would be completed in 1989. Currently, the UPA, with the exception of Big Sand Spring itself, is well protected and thriving in the absence of burro and cattle trampling. The Sodaville milk vetch population is likewise healthy and expanding in range and numbers. The proposed exclosure around Big Sand Spring, with an external watering trough, would allow the recovery and expansion of the wet meadow. The future use of the millsite claim is unknown, but the BLM has full authority to preserve and protect the UPA and rare plant population under the CDCA Plan of 1980 and the BLM's sensitive plant policy.

Livestock Grazing

Grazing use would continue to be managed under the provisions of the current grazing regulations and the guidance of the CDCA Plan. Under the CDCA Plan, an allotment management plan would be prepared and implemented. The AMP would address resource conflicts, propose management to resolve the issues and prescribe monitoring studies. Due to the low use that occurs in this area, there would be few changes in livestock use.

Wild Horse and Burros

All burros would be removed from this parcel under the Wild Horse and Burro Act.

Cultural Resources

To the extent that current use remains unchanged, cultural resources would continue to deteriorate slowly from both natural processes and/or contemporary land uses. All authorized surface disturbing actions on public lands would continue to be subject to the relevant cultural resource laws and regulations, with avoidance or mitigation of impacts on significant properties.

Cultural resources are not threatened by any actions specifically authorized by BLM; however, they are threatened by recreational artifact collectors, campers, and wild burros. Unauthorized collecting is an on-going problem throughout the desert. BLM uses several methods to control these activities;

the most common in this area is patrol by rangers. Recent staff increases, particularly the expansion of BLM's ranger force, have and would continue to improve BLM's ability to control this type of impact.

Camping has also affected one site; however, the degree of disturbance has remained the same for the past ten years and appears to be stable. Wild burros have also disturbed this site during visits to the on-site water source, but will be removed from the North Death Valley parcel under this alternative.

Lands

With the exception of the 11,680 acres to be managed under BLM classes L and M, management of the majority of the area under the CDCA Plan guidelines would be similar to NPS management. Military overflights at altitudes less than 3,000 feet would continue.

Management Presence

BLM's expanded ranger force would continue to patrol the parcel on a twice-weekly basis. This would be a significant increase over the frequency of patrol provided in the past.

The rate of visitation of BLM staff specialists would continue to be dependent on an as-needed basis. Recent staff increases would increase the rate of visitation slightly, as more time could be spent in the field during the processing of any given application or project.

Recreation

Many variables, such as possible wilderness designation for all of part of the parcel or the paving of the Big Pine/Death Valley Road, make accurate visitation projection difficult. The BLM has no current plans to build any new recreational access routes, campgrounds, interpretative facilities or other developments in the parcel. Recreational use would continue to grow slowly in this area.

Wilderness

IMP guidelines would continue to be followed by the Bureau in both recommended suitable and nonsuitable WSAs. The IMP guidelines would continue to be followed until Congress made decisions on permanent wilderness designation.

Geology-Energy-Minerals

General Discussion: Certain management aspects of the no action alternative would affect all five of the parcels in the same manner. A discussion of these follows. The discussion applies not only to the North Death Valley parcel, but to the other four parcels as well. Mining activity would be regulated under the 43 CFR 3802 and 3809 regulations, resulting in the following:

a. The areas would be left open to mineral entry as per the Mining Law of 1872 and subsequent Federal laws regulating mineral excavation.

   The minor effects of location, such as access, staking and maintenance of monuments would continue. The potential for surface disturbance would be greater in the event that new mineral resources were discovered. The potential for expansion of employment and revenue for Inyo County would not be diminished.

b. Surface impacts from mineral development would be regulated by the 43 CFR 3809 or 43 CFR 3802 regulations.

   Surface disturbance from activities allowed under the general mining laws on mining claims may not be denied by the Secretary of Interior except in cases where an environmental analysis has determined that the potential for undue and unnecessary degradation and impairment of wilderness values exist. The BLM surface management regulations are most effective and mitigate impacts for operations with a total surface disturbance of greater than five acres, or for all surface disturbing activity in designated wilderness areas, wilderness study areas, and areas under the CDCA Plan's multiple use class L.

c. Bonding for operations outside of WSAs would continue to be at the discretion of the authorized officer. Mandatory bonding for operations within WSAs would continue to be required.

d. Claim holders would be required to perform assessment work.

   The potential for surface disturbance would be greater than if the parcels were transferred. The diligence requirement necessary to develop the property would continue.

e. Claim validities would only be scheduled to verify valid existing rights in wilderness study areas and elements of the National Wilderness System prior to surface disturbing activities.

f. Access would be regulated under the 43 CFR 3809 or 3802 regulations. A special use fee is not required for access.

g. Water use would be regulated under the 43 CFR 3809 or 3802 criteria in conjunction with the appropriate state agencies.

Parcel Two: Hunter Mountain

Wildlife

Under the CDCA Plan the parcel would continue to be within the Hunter Mountain Grazing Allotment and subject to cattle grazing. Cattle access to the water sources, riparian habitats and the parcel in general could be modified under an allotment management plan or habitat management plan (see below, Livestock Grazing, for a discussion of measures that are being considered for implementation in the allotment management plan). Since neither of these have been completed, it has not yet been determined how the concerns of viral disease transmission from cattle to bighorn, the social impact of cattle on deer and bighorn, and the impacts on riparian and aquatic habitats would be alleviated.

Under the No Action Alternative, cattle may continue to use the parcel and drift of these animals into Death Valley National Monument would continue until the Hunter Mountain Allotment Management Plan is implemented. The draft AMP proposes to reduce the number of cattle grazing along the Death Valley National Monument boundary and to fence parts of the boundary. These actions would virtually eliminate cattle drift into Death Valley National Monument. Such a fence, even though designed to allow for the passage of deer and bighorn, may inhibit movement of these two native ungulates to an unknown degree.

Hunting opportunity and a regulated harvest of quail, chukar and deer from the parcel would continue under CDFG regulations. There would probably be no detectable change in populations of chukar and quail due to hunting. There are no data or studies in this area that provide insight into the effect of hunting on deer. However, hunting could be resulting in a greater percentage of does in the population than would occur under natural conditions.

BLM would continue to work through its cooperative management policy with the California Department of Fish and Game.

Livestock Grazing

Grazing use would continue to be managed under the provisions of the current grazing regulations and the guidance of the CDCA Plan. An AMP would be completed and implemented. The AMP would address resource conflicts, propose management to resolve the issues and prescribe monitoring studies. Reduced stocking rates in the Hunter Mountain parcel and boundary fencing would eliminate livestock drift onto the Death Valley National Monument. Management would be implemented to reduce conflicts between cattle and wildlife. Actions would include deferring grazing use of Hunter Mountain until after spring greenup, excluding grazing from a portion of the bighorn sheep range, providing additional water sources, the installation of protective fencing around certain springs (probably including Jackass, Deadhorse, and Quail springs). Because burros have been, and would continue to be, removed from the parcel, the current low utilization rates would continue, resulting in an upward trend in vegetation condition.

Wild Horse and Burro

Current management guidelines call for removal of all horses and burros from the parcel. A few burros may wander onto the parcel from the Lee Flat Herd Management Area. That herd would be maintained at less than 30 head.

Cultural Resources

To the extent that current use remains unchanged, cultural resources could continue to deteriorate slowly, from both natural processes and/or contemporary land uses. All authorized surface disturbing actions on public lands would continue to be subject to the relevant cultural resource laws and regulations, with avoidance or mitigation of impacts on significant properties.

The cultural resources have been affected by grazing cattle, wild horses and burros, recreational collectors and campers (at several undesignated sites along the Hunter Mountain road). A number of studies on the effect of cattle on lithic scatters shows that cattle damage artifacts and displace them vertically and horizontally. Cattle also affect cultural resource sites by reducing plant cover, which promotes soil erosion and consequently the loss of artifacts and soils from archaeological sites. Since these studies, which were done in several western states and under varying range conditions, show adverse effects on grazing and cultural resources, it is inferred that grazing on Hunter Mountain has also adversely affected sites. Grazing has a relatively long history in the area and is an on-going multiple-use; therefore, there are no planned actions to curtail grazing.

It can be assumed that wild horses and burros have had an affect on cultural resources similar to that of cattle. BLM is vigorously pursuing capture and removal of animals over a set herd size.

Unauthorized collection of artifacts and vandalism are continual problems which are random events in time and place and are therefore difficult to control. BLM uses several methods to discourage these activities; the most common in this area is patrol by rangers. The recent increase in the BLM ranger force would help to lessen this type of impact. One of the prehistoric sites has been used and continues to be used as a modern camp. Disturbance to cultural resources has already occurred and future camping would create no further disturbance unless the intensity of use increases.

Lands

With the exception of about 3,000 acres of BLM class L in the northeastern portion of the parcel, management of the majority of the area would be similar to NPS management. The Hunter Mountain road could be improved. Military overflights at altitudes of less than 3,000 feet would continue.

Management Presence

BLM's expanded ranger force would continue to patrol the parcel three times per week. This would be a significant increase over the frequency of patrol provided in the past.

The rate of visitation of BLM staff specialists would continue to be dependent on an as-needed basis. Recent staff increases would increase the rate of visitation a moderate amount, as more time could be spent in the field during the processing of any given application or project.

Recreation

The no action alternative would continue to allow about 1,500 visitor use days per year of BLM monitored recreation use on the Hunter Mountain parcel. Hunting, trapping and target shooting would be allowed under state and local restrictions. Camping would be allowed along existing open roads.

Wilderness

Impacts would be the same as under the No Action Alternative for the North Death Valley parcel.

Geology-Energy-Minerals

Minerals would continue to be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802. A general discussion of these impacts can be found in the GEM analysis for Alternative E, Parcel One.

Parcel Three: Pyramid Peak

Wildlife

BLM would retain management authority over all of the lands proposed for transfer. Thus, management options would be maximized. Seriously damaged guzzlers could be replaced, new guzzlers could be built, and bighorn transplants could be conducted as necessary and appropriate. Nonetheless, because the BLM has management responsibility over such a small proportion of the Funeral Mountains, this area would receive a low funding priority in the Department of Fish and Game (Cooperrider, 1988).

Botany

The effects of continued BLM management would be slight in the short term. As indicated in the discussion of the effects of the proposed action, management of sensitive resources within DVNM and outside is essentially the same. Long term effects would occur as a result of surface disturbance authorized by BLM under the general land laws and mining laws, and could result in minor adverse effects on localized plant populations.

Cultural Resources

To the extent that current use remains unchanged, cultural resources would continue to deteriorate slowly from both natural processes and/or contemporary land uses. All authorized surface disturbing actions on public lands would continue to be subject to the relevant cultural resource laws and regulations, with avoidance or mitigation of impacts on significant properties.

The primary protection for cultural resources is the relative lack of intensive contemporary use. As use increases over the next 20 years, management attention would increase to channel conflicting land uses away from areas containing significant cultural resources. This would be aided by the recent expansion of BLM's ranger force, due to which the frequency of ranger patrol of the parcel would be significantly increased.

Lands

CDCA Plan prescriptions for the Pyramid Peak parcel are very similar to probable NPS actions described in Alternative A. The only difference is that the bajada adjacent to State Highway 190 would not be designated as wilderness, but would be managed under the CDCA Plan multiple use class M guidelines. As a result, sand and gravel resources along the highway would be available for extraction. This should be of little short-term importance, however, as more readily available sites occur nearby which should satisfy demand over the next 20 years.

Management Presence

BLM's expanded ranger force would continue to patrol the parcel on a daily basis. This would be a significant increase over the frequency of patrol provided in the past.

The rate of visitation of BLM staff specialists would continue to be dependent on an as-needed basis. Recent staff increases would increase the rate of visitation slightly, as more time could be spent in the field during the processing of any given application or project.

Wilderness

Impacts to wilderness values would be negligible in the Pyramid Peak parcel. Under BLM management smaller acreages would be designated wilderness, with the balance of the area available for multiple uses other than wilderness. Under National Park Service Management, 100 percent of the Pyramid Peak Parcel would ultimately be designated wilderness. The BLM has recommended 80 percent of the Pyramid Peak Parcel for wilderness designation.

Recreation

Impacts on the Pyramid Peak area would be very similar to Alternative A: Parcel Three. The majority of this parcel is recommended by BLM as suitable for wilderness designation. Low levels of wilderness types of recreational uses would continue to be the primary use of the area.

Geology-Energy-Minerals

Minerals would continue to be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802. A general discussion of these impacts can be found in the GEM analysis for Alternative E, Parcel One.

Within the next 15 to 20 years, it is anticipated that BLM would receive a plan of operations for borate exploration drilling. If borates are found, the southwest part of the parcel probably would not be developed until after 2015 due to existing borate reserves at Boron, Ryan and the Billy Mine in Death Valley. See Alternative A: Parcel Three for a discussion of anticipated impacts.

Because of the supply and demand situation, it is not likely that carbonate rocks, silica, clay, zeolites or sand and gravel would be developed in the CDCA Plan multiple use class M area for the next 20 years.

Parcel Four: Greenwater Valley

Wildlife

Under this alternative the BLM would retain management authority over all of the lands proposed for transfer. Thus, management options would be maximized. Seriously damaged guzzlers could be replaced, new guzzlers could be built, and bighorn transplants could be conducted as necessary and appropriate. Nonetheless, it should be pointed out that because the BLM has management responsibility over such a small proportion of the Black Mountains, this areas would receive a low funding priority (Cooperrider, 1988).

The current multiple-use class and mining operations in the Ibex Hills are detrimental to wildlife in general and particularly to bighorn sheep. The predominantly class I (intensive use) designation would tend to encourage mineral development of this area.

Botany

The possible long term protective effects of DVNM management described in Alternative A: Parcel Three would not be realized under this alternative.

Cultural Resources

To the extent that current use remains unchanged, cultural resources would continue to deteriorate slowly from both natural processes and/or contemporary land uses. All authorized surface disturbing actions on public lands would continue to be subject to the relevant cultural resource laws and regulations, with avoidance or mitigation of impacts on significant properties.

The primary protection for cultural resources is the relative lack of intensive contemporary use. As use increases over the next 20 years, management attention would increase to channel conflicting land uses away from areas containing significant cultural resources. This would be aided by the recent expansion of BLM's ranger force, due to which the frequency of ranger patrol of the parcel would be significantly increased.

Lands

Desert Plan prescriptions vary significantly from the probable NPS actions described for the Greenwater Valley parcel in Alternative A. Only about 20 percent of the area is recommended as suitable for wilderness designation, with associated land acquisition, rights-of-way phase-out, and land use restrictions. Continued management under CDCA Plan multiple use classes L, M and I guidelines on the remaining 80 percent of the area would generally be consistent with the applicable open space elements of the Inyo County General Plan. Management ineffectiveness due to split jurisdiction and existing non-descript monument boundaries would be perpetuated.

Management Presence

BLM's expanded ranger force would continue to patrol the parcel daily. This would be a significant increase over the frequency of patrol provided in the past.

The rate of visitation of BLM staff specialists would continue to be dependent on an as-needed basis. Recent staff increases would increase the rate of visitation slightly, as more time could be spent in the field during the processing of any given application or project.

Wilderness

Only 20 percent of the parcel would be recommended for wilderness designation. The remaining 80 percent would be available for multiple uses other than wilderness. As a result, wilderness values would decline over the long term in most of the parcel.

Recreation

Primitive types of recreation use within the portion of the Greenwater Valley area that the BLM has recommended as suitable for wilderness designation are expected to increase slightly. Historically, once specific areas are designated wilderness, there are increases in visitor use. Over the long term, however, use levels are expected to remain low due to extreme temperatures, lack of water, and relative isolation of the area.

Recreational use patterns and levels within the balance of the Greenwater Valley area are not expected to change from the present. Low levels of off-highway vehicle use and primitive types of recreation would continue. Any additional mineral development in the southern portion of the area could increase the number of access routes available for off-highway vehicle use.

Geology-Energy-Minerals

Minerals would continue to be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802. A general discussion of these impacts can be found in the GEM analysis for Alternative E, Parcel One.

Under this alternative, about 92,000 acres of land would be managed for multiple use, including operation of the mining laws. About 25,000 acres of class C land may ultimately become designated as wilderness. Mining activity would be concentrated in the southern one third of the parcel.

About $1^1/_2$ square miles near the Rusty Pick mine (southwest corner of Parcel Four) and under BLM multiple use class M has high potential for the development of talc. It is anticipated that at least one talc mine would be developed, based on a past mining proposal. Mining, if authorized, would be by trenching, resulting in a series of trenches up to 300 feet long by 50 feet wide and 40 feet deep over a total distance of 2,000 feet. Production over a five-year period would produce up to 10,000 tons of talc worth $500,000. In the second high potential talc area, Ibex Hills, the development scenario would be for an operation sometime in the next 10 to 20 years at least twice as large as the deposits near the Rusty Pick mine. This is because of the more numerous talc occurrences.

The large, high potential zone for precious and base metals would probably produce at least one small gold mine over the next 10 years if left under multiple use management. Mining would probably result in extending drifts and stopes from existing underground workings in addition to creating perhaps a thousand feet of new workings along vein deposits. Adits and drifts would likely be six feet wide by eight feet high. A mill would have to be built and a few hundred thousand tons of waste rock and tailings would have to be piled. Recovered values may approach 10 to 20 million dollars over the next 10 to 20 years.

The potential for metallic mineral development near the Rusty Pick mine is low over the next 15 to 20 years due to the low price of silver and base metals and the fact that the Rusty Pick mine is on State land.

The two Caltrans material sites would be outside of the modified parcel boundaries, and could continue operating. Therefore, an estimated 500,000 cubic yards of sand and gravel would continue to be available from these sites for the maintenance of Highway 127.

It is unlikely that geothermal energy would be developed in the parcel within the next 15 to 20 years because of the sparse population.

Parcel Five: Pinto Basin

Wildlife

Desert Tortoise: The eastern portion of the desert tortoise concentration area would continue to be managed by the BLM. Under existing guidance from the CDCA Plan, OHV use would be allowed on existing ways. This, then, allows some small potential for loss of tortoises from vehicular use in the ways that transverse the area.

Mountain sheep: As noted in Alternative A, both transfer and retention of these lands would have beneficial and negative impacts. The major negative impact of retention would be the continued threat of habitat loss due to mining activity until (and unless) it is designated as wilderness by Congress. Positive impacts from retention include the continued opportunity to develop additional water sources in the large areas of water-deficient mountain sheep range.

Botany

If the recommended BLM Eagle Mountain Wilderness were to be approved, the vegetation of all of the area covered under Alternative A, and most of the area covered under Alternative C, would benefit from a level of protection similar to the protection that would result from a transfer to the monument.

Livestock Grazing

Since there is no current or scheduled livestock grazing in the area, there would be no effect under Alternative D.

Wild Horse and Burro

Since there are no wild horses or burros in the area, there would be no effect under Alternative E.

Cultural Resources

To the extent that current use remains unchanged, cultural resources would continue to deteriorate slowly from both natural processes and/or contemporary land uses. All authorized surface disturbing actions on public lands would continue to be subject to the relevant cultural resource laws and regulations, with avoidance or mitigation of impacts on significant properties.

The majority of the geographical area of alternatives A and C falls within the boundaries of the Eagle Mountain Wilderness Study Area. The area of alternative A is not recommended for wilderness designation. If wilderness status is denied, multiple use pressures would continue to retain the potential for impacts on cultural resources.

Approximately half of the area of alternative C has been recommended for wilderness designation. If Congress grants wilderness status to the recommended area of alternative C, much of the potential for vandalism and other human impacts on cultural resources would be curtailed. The BLM's recent ranger force increases would also provide for more effective management and control of these impacts.

Lands

Existing management would remain the same. There would be no conflicts with mining interests, as would most probably happen under Alternative C. In turn, the area would continue to be administered by the BLM under the concept of multiple use management, with discretionary authority. The Park Service is not a multiple use agency, and therefore certain discretionary actions would not be permitted.

Management Presence

BLM's rangers would rarely have occasion to enter the area, other than for monthly monitoring of the WSAs. Thus, the frequency of patrol would not noticeably increase over past levels.

The rate of visitation of BLM staff specialists would continue to be dependent on an as-needed basis. Recent staff increases could increase the rate of visitation slightly, but because of the extremely low level of activities in this area, visitation would still be infrequent.

Recreation

Balanced management for a variety of recreational uses would continue. Activities as described in Affected Environment, Parcel Five would continue into the forseeable future. Slight increases in all use categories can be expected. However, the area is currently under-utilized and has the capacity to absorb much greater levels of use without diminishing the quality of the experiences available.

Any future wilderness designations in the Black Mountains would significantly alter the recreational use patterns. If BLM recommendations are followed, the southern portion of the study area would become designated wilderness. Under this scenario, OHV touring and sightseeing opportunities would be largely reduced. Vehicle use would be restricted to the Black Eagle Mine Road and a few other mining roads that branch from it. Access to the area would be limited to the Black Eagle Mine Road through JTNM. Lack of access and fewer available vehicle routes would diminish the attraction of the area and OHV touring recreation levels would drop.

Other activities would be similarly affected due to reduced access and area of use. Target shooting and roadside camping would be curtailed. Rockhounding would still occur in the most popular areas (Storm Jade and Rainbow Mine environs), but would suffer somewhat because vehicle access to new areas to explore would not be available. Habitat for quail and chukar would improve but lack of access would preclude hunting in the Big Wash drainage.

Hiking, backpacking and other privitive uses would be enhanced because of the elimination of motorized and vehicle dependent activities. The quality of the experience would also benefit from the parcel's location next to existing wilderness in JTNM.

Wilderness

Current management practices as outlined in the CDCA Plan would continue. The Eagle Mountain and Pinto Basin WSAs would continue to be managed under the IMP, and wilderness values in both areas would be protected until such time as Congress acts on the Bureau's recommendations. If these two areas are designated, their wilderness values would be protected indefinitely.

If the northern portion of the Eagle Mountain WSA, which is not recommended as suitable, is not designated by Congress, most wilderness values would be eventually lost due to intensive use of the area. This would also hold true for the former Pinto Basin WSA if Congress does not designate it as a wilderness area.

Geology-Energy-Minerals

Minerals would continue to be managed under the unnecessary or undue degradation provisions of 43 CFR 3809 and 3802. A general discussion of these impacts can be found in the GEM analysis for Alternative E, Parcel One.

CHAPTER 5

CONSULTATION and COORDINATION

CHAPTER V

CONSULTATION AND COORDINATION

INTRODUCTION

On May 19, 1988 the Western Regional Office of the National Park Service submitted a proposal to the California State Office of the Bureau of Land Management to transfer five parcels of land totalling 272,849 acres from BLM jurisdiction to the Death Valley and Joshua Tree National Monuments.

A notice of intent to prepare an environmental impact statement was announced in the Federal Register on May 31, 1988. The notice included a description of the Park Service proposal, and the times and locations of five public scoping meetings.

Immediately after the publication of the notice of intent, a news release concerning the project and announcing the scoping meetings was released. The news release was sent to media throughout southern California, and to the California Desert District general mailing list (about 6,000 individuals and organizations).

Five public scoping meetings were held between June 14 and June 17. Two meetings were held in Riverside (June 14; about 25 persons attendees each meeting). Other meetings were held in Palm Springs (June 15; 20 attendees), Ridgecrest (June 16; 35 attendees), and Independence (June 17; 55 attendees).

The stated purpose of the meetings was to allow the public to identify those issues that should be addressed in the environmental impact statement. Issues were suggested by the audience, and written on flip charts. A combined list of the issues identified at the meetings is presented in Appendix F. The meeting (or meetings) at which an issue was identified is identified by the following code: Riv A (Riverside morning), Riv B (Riverside evening), PS (Palm Springs), RD (Ridgecrest), and I (Independence).

Letters were also accepted from the public during the scoping process. Over 50 letters were received by BLM; sentiments and thoughts were generally either were those presented in Appendix F, or were opinions concerning whether or not the transfer should proceed.

The public review period for the draft EIS began July 29, 1988. During the 90 day public comment period (which ended October 27, 1988) six formal public hearings were held to solicit comments on the draft EIS. These hearings were held in Riverside (two meetings), Palm Springs, Ridgecrest, Lone Pine and Tecopa Hot Springs.

The public hearing transcripts have not been reprinted in this Final EIS as they are part of the public record and are available for review at the following location:

Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

The following agencies, organizations and industries have provided input to and/or received copies of the Draft EIS.

Federal Agencies

U.S. Fish & Wildlife Service
Northwest Regional Office
500 NE Malthoman St.
Suite 1692
Portland, OR 97232

U.S. Fish & Wildlife Service
1500 N. Decatur Blvd
Las Vegas, NV 89108

Federal Highway Administration
Region 9
2 Embarcadero Center, Rm 530
San Francisco, CA 94111

George Air Force Base
831 CSG/DE
George AFB, CA 92394

U.S. Geological Survey
345 Middlefield Road
Menlo Park, CA 94025

China Lake Naval Weapons Center
Environmental Division
Public Works Department
Building 981
China Lake, CA 93555

U.S. Fish & Wildlife Service
4600 Kietzke Lane
Building C
Reno, NV 89502

WACC
National Park Service
P.O. Box 41058
Tucson, AZ 85717

Ft. Irwin National Training Center
Director of Engineering & Housing
Ft. Irwin, CA 92310

Bureau of Mines
Western Field Operation Center
E. 360 3rd Street
Spokane, WA 99302

Department of Transportation
Federal Aviation Administration
Sector Office
831 Mitten Rd.
Burlingame, CA 94010

Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

U.S. Fish & Wildlife Service
2800 Cottage Way
Sacramento, CA 95825

Environmental Protection Agency
Region 9
215 Fremont St.
Sacramento, CA 94105

Department of Agriculture
Forest Supervisor
873 N. Main
Bishop, CA 93514

U.S. Dept. of Agriculture
Soil Conservation Service
136 Edwards
Bishop, CA 93514

Wendy Waiwood
AFFTC/XR
Edwards AFB, CA 93523

Director, National Park Service
Division of Env. Compl.(NPS 135)
18th and C St., N.W.
Washington, D.C. 20240

U.S. Dept. of Army, L.A. Dist.
Corps of Engineers
P.O. Box 2711
Los Angeles, CA 90053

U.S. Dept. of Interior
Bureau of Reclamation
Lower Colorado Reg'l Office
P.O. Box 427
Boulder City, NV 89005

Regional Forester
U.S. Forest Service, USDA
630 Sansome Street
San Francisco, CA 94111

R. Twitchell, Nat. Res. Mgr.
Facilities Division, Bldg. 102
Marine Corps Air Base
Twentynine Palms, CA 92278

State of California

Office of Historic Preservation
Department of Parks & Recreation
P.O. Box 2390
Sacramento, CA 95811

California Department
of Fish & Game
1416 9th Street
Sacramento, CA 95814

State Clearinghouse
1400 Tenth St., Rm 121
Sacramento, CA 95814

State Land Commission
1807 13th Street, Rm 101
Sacramento, CA 95814

CA. Dept. of Parks & Rec.
SO Headquarters
1333 Camino Del Rio, Ste. 200
San Diego, CA 92108-3520

California State University
Sacramento
6000 J. Street
Sacramento, CA 95819

Department of Fish & Game
407 West Line
Bishop, CA 93514

Department of Fish & Game
Region 5
245 W. Broadway, Suite 350
Long Beach, CA 90802

Reg'l Water Quality Control Board
Colorado River Basin
73271 Hwy 111, Suite 21
Palm Desert, CA 92260

Reg'l Water Quality Control Board
Lahoutan
15371 Bonanza
Victorville, CA 92392

State of Nevada

Esmeralda County Commissioners
Courthouse
Goldfield, NV 89013

Nye County Commissioners
P.O. Box 153
Tonopah, NV 89049

Nevada State Clearing House
John Walker
Office of Comm. Services
1100 E. Williams St. Suite 117
Carson City, NV 89710

California Local Agencies

San Bernardino County
Board of Supervisors
385 N. Arrowhead Ave.
San Bernardino, CA 92415

Inyo County Board of Supervisors
P.O. Drawer F
Independence, CA 93526

Chamber of Commerce
Bishop, CA 93514

Chamber of Commerce
Ridgecrest, CA 93555

Director
Riverside County Planning
4080 Lemon St., 9th Floor
Riverside, CA 92501

Riverside County
Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

Metropolitan Water District
P.O. Box 54153
Los Angeles, CA 90054

Chamber of Commerce
Shoshone, CA 92384

Chamber of Commerce
Lone Pine, CA 93545

Coachella Valley Assn of Govt.
74-133 El Paseo, Ste 4
Palm Desert, CA 92260

So. Lahontan Reg'l Water Qual.
Control Board
15371 Bonanza
Victorville, CA 92392

Planning Director, Inyo County
Courthouse
Independence, CA 93526

Industry

Pzizer Minerals Division
15962 Quantico Road
Apple Valley, CA 92307

American Borate Company
Star Route 15
Box 610
Lathrop Wells, NV 89020

Cyprus Industrial
Mineral Company
7000 South Yosemite St.
Englewood, CO 80015

Nevada Mining Association
1 E. 1st St, Suite 900
Reno, NV 89501

Molycorp, Inc.
Union Oil Center
P.O. Box 54945
Los Angeles, CA 90054

U.S. Borax & Chemical Corp.
3075 Wilshire Blvd.
Los Angeles, CA 90010

TW Services, Inc.
ATTN: Paul Trammell
P.O. Box 400
451 N. Main Street
Cedar City, UT 84720

American Mining Congress
1920 N. Street N.W.
Suite 300
Washington, D.C. 20036

Southern California Edison
510 S. China Lake Blvd.
Ridgecrest, CA 93555

Gold Fields Mining Co.
200 Union Blvd., Suite 500
Lakewood, CO 80228

Organizations

The Committee for California
Desert National Parks
2401 Colorado Avenue Suite 180
Santa Monica, CA 90404

Sierra Club
244 Filmore Street
San Francisco, CA 94115

California Desert Coalition
6192 Magnolia Ave, Suite D
Riverside, CA 92506

Sierra Club
Desert Committee
43730 N. Higbee Avenue
Lancaster, CA 93534

The Wilderness Society
1791 A Pine Street
San Francisco, CA 94109

Death Valley 49'ers
ATTN: Ray Peter
5002 Stern Ave.
Sherman Oaks, CA 91423

The Wilderness Society
Patty Schfferle
1791 Pine Street
San Francisco, CA 94109

California Wildlife Federation
1023 J Street, Suite 203
Sacramento, CA 95814

Nevada Wildlife Federation
P.O. Box 71238
Reno, NV 89570

The Wilderness Society
Steve Whitney
1400 Eye Street, N.W.
Washington, D.C. 20005

Desert Bighorn Council
C/O P.O. Box 1806
Carson City, NV 89701

California Native Plant Society
Suite D, 2380 Ellsworth St.
Berkeley, CA 94704

Friends of the Earth
Connie Parrish
1045 Sansome Street
San Francisco, CA 94111

The Nature Conservancy
213 Stearns Wharf
Santa Barbara, CA 93101

California Association of
Four Wheel Drive Clubs
1730 I. St. Suite 240
Sacramento, CA 95814

The Wildlife Society
5410 Grosvenor Lane
Bethesda, MD 20814

National Wildlife Federation
1412 16th Street, N.W.
Washington, D.C. 20036-2266

Red Rocks Audubon Society
P.O. Box 42944
Las Vegas, NV 89116

Desert Fishes Council
407 W. Line Street
Bishop, CA 93514

Society for the Conservation
of Bighorn Sheep
3113 Mesaloza Lane
Pasadena, CA 91107

National Audobon Society
555 Audobon Place
Sacramento, CA 95825

Desert Tortoise Council
5319 Cerritos Ave.
Long Beach, CA 90805

National Parks and
Conservation Association
1701 18th Street N.W.
Washington, D.C. 20009

Citizens for Mojave Nat'l Park
P.O. Box 106
Barstow, CA 92311

Native Americans

Native American
Heritage Commission
915 Capitol Mall, Rm 288
Sacramento, CA 95814

Bureau of Indian Affairs
Central California Agency
1800 Tribute Road
P.O. Box 15740
Sacramento, CA 95852

Tribal Chair
Bishop Reservation
P.O. Box 548
Bishop, CA 93514

Tribal Chair
Lone Pine Reservation
1101 S. Main St.
Lone Pine, CA 93545

Chairman
Torres Martinez Reservation
66-725 Martinez Road
Thermal, CA 92271

Timbisha Shoshone
Tribal Council
P.O. Box 206
Death Valley, CA 92328

Tribal Chair
Big Pine Reservation
P.O. Box 384
Big Pine, CA 93513

Tribal Chair
Fort Independence Reservation
P.O. Box 67
Independence, CA 93526

Tribal Chair
Agua Caliente Indian Reservation
60 E. Tahquitz Way, Suite 106
Palm Springs, CA 92262

Libraries

Govt. Public Dept.
Rivera Library, Box 5900
Univ. of California, Riverside
Riverside, CA 92517

Univ. of Nevada, Las Vegas
4505 S. Maryland Parkway
Las Vegas, NV 89154

Clark Co. Public Library
1401 E. Flamingo
Las Vegas, NV 89119

Inyo Co. Public Library
Independence, CA 93526

Govt. Documents Dept.
University Research Library
U.C.L.A.
405 Hilgard Avenue
Los Angeles, CA 90024-1302

Inyo County Library
68 N. Edwards
Indepdendence, CA 93526

Coachella Valley Library
200 Civic Center Mall
Indio, CA 92201

Inyo County Library
Washington & Bush
Lone Pine, CA 93545

Palm Springs Library Center
300 S. Sunrise Way
Palm Springs, CA 92262

Govt. Documents Dept.
Shields Library
Univ. of California, Davis
Davis, CA 95616-5292

San Bernardino Public Library
Norman-Feldheym Central Library
555 W. 6th Street
San Bernardino, CA 92410-3094

Inyo County Library
210 Academy Ave.
Bishop, CA 92311

PUBLIC HEARING COMMENTS AND RESPONSES

Table 5-1 contains a summary of the comments and questions raised at the public hearings on the Draft EIS of the Monuments' land transfer. Formal responses have been prepared for only those comments/questions that address the adequacy and/or accuracy of the Draft EIS. However, all comments and opinions will be considered by the BLM in the final decision making process.

PUBLIC HEARINGS AND RESPONSES

September 19, 1988
Riverside, Ca.
10:00 AM

1. Dan Eyde, GSA Resources
   Transfer of Hunter Mountain would result in the lost of a valuable mineral wollastonite.

2. Norbert Riedy, The Wilderness Society
   The DEIS failed to consider other additions to the Monuments

3. Gay Gotses, Wild Horse Organized Assistance
   Under NPS management burros straying onto Hunter Mountain would be destroyed.

4. Eldon Hughes, California Desert Protection League
   The DEIS did not consider other additions to the Monuments

5. Russ Butcher, National Parks & Conservation Association
   Supports Alternative A and believes other areas could be added.

Riverside, Ca
7:00 PM

1. Judith Anderson, Sierra Club's Desert Committee
   Removal of mineralized area in North Death Valley parcel should not be considered as a mitigation.

2. Steve Kuehl, Land Access Committee for the Cal Off-Road Vehicle Assoc.
   High, medium and low are not defined as regards impacts.

3. Beule Edmiston, Friends of Wildlife
   Concurs with Alternative A.

4. E.O. Spencer
   Wollastonite is world class deposit which is not noted in the DEIS.

September 20, 1988
Palm Springs, Ca

1. Leslie Gold
   Against transferring Pinto Basin to JTNM.

September 19, 1988
Riverside, Ca.
10:00 AM

RESPONSE TO

1. Dan Eyde
See response to written comment 64-1

2. Norbert Riedy
See response to written comment 46-1.

3. Gay Gotses
See response to written comment 64-1

4. Eldon Hughes
See response to written comment 46-1

Riverside, Ca
7:00 PM

RESPONSE TO

1. Judith Anderson
See response to written comment 46-1.

Mitigation can involve non-living as well as living components of the environment.

2. Steve Kuehl
See response to written comment 110-1.

4. E.O. Spencer
See pages 4-17 and 4-35 in EIS.

2. Jon M. Steward, Coachella Valley Audubon Society
   Concurs with Alternative A.

3. Dan Cronkhite
   Concurs with Alternative E.

4. Bern Schwen, Tahquitz Group and San Gorgonia Chapter, Sierra Club
   The DEIS should have included additional lands.

September 21, 1988
Ridgecrest, Ca

1. James J. Shea
   Supports Alternative E.

2. Mary Ann Henry
   The DEIS should have included additional lands.

   The botany section should reflect the presences of Mojave Fishhook Cactus (Sclerocactus polyancistrus) which is a Category 2 plant, a candidate for threatened status; it is on List 4 of the proposed 4th edition of the California Native Plant Society Inventory of Rare and Endangered Vascular Plants in California.

3. Bill Gossett
   Supports Alternative E.

4. Pierre Saint-Amand
   Supports Alternative E.

5. Sophia Ann Merk
   Transfer of land will close off pinyon gathering to Native Americans.

6. Ron Schiller, Hi-Desert Multiple Use Coalition
   The DEIS does not address the impact to loss of recreational opportunity under NPS management and impact on surrounding areas.

   No specific cases of blue tongue and other diseases are cited for Hunter Mountain.

   Disagrees with the statement (page 4-3) that under NPS North Death Valley would receive more public use.

7. Clyde Weekly
   Minerals are a concern.

September 20, 1988
Palm Springs, Ca

RESPONSE TO

4. **Bern Schwen**
See response to written comment 46-1.

September 21, 1988
Ridgecrest, Ca

RESPONSE TO

2. **Mary Ann Henry**
See response to written comment 46-1.

The 4th edition (1988) lists Sclerocactus polyancistrus as having the Federal status of C3, indicating that the is too widespread and/or not threatened at this time to be considered threatened or endangered.

5. **Sophia Ann Merk**
See response to written comment 64-1.

6. **Ron Schiller**
See response to written comment 89-19 and 91-1.

Most of the discussions on diseases is hypothetical at this time. The cattle on Hunter Mountain have not not, to our knowledge been tested for bluetongue or any other disease of concern.

We agree. The statement has been changed from "would" to "may"; and the second sentence of the paragraph will begin "If use increases...".

September 27, 1988
Lone Pine, Ca

1. David Kruger
Does not believe that National Park Service proposed transfer.

2. Michael Ushman
NPS lacks funds to manage transferred land.

3. Nadden Naylor, Lone Pine Paiute Shoshone Reservation
The Lone Pine Paiute Shoshone Tribe is opposed to transfer of Hunter Mountain.

4. Stan Haye
The DEIS should considered addition lands.

5. Roger DeHart, Planning Director, Inyo County Planning
The rationale unifying ecological, topographic and jurisdictional units is not consistent.

6. Mary DeDecker
There is rare plant, a little lily, on the California rare plant list in Greenwater Valley not noted in the DEIS.

7. Vincent Yoder, California Native Plant Society
Alternative A along with Alternative C and D is recommended.

8. Michael Prather, Eastern Sierra Chapter of the Audubon Society
The DEIS should have addressed addition lands.

9. Sophia Ann Merk
Will NPS propose for threatened or endangered list exotics they have introduced ?

   Under NPS policy no collection of minerals, rocks or vegetative products is permitted.

   NPS has established its own guidelines regarding altitude that private or military planes can fly.

   Will NPS build another Furnace Creek Inn on Hunter Mountain?

10. Jeanne Lopez, R.C. Kemp, Joy Volkman, Earl Wilson, Allen J. Warner, Scott Kemp (Inyo-Mono County Farm Bureau)
Each is against the proposed transfer.

11. Pauline Estebes, The Western Shoshone National Council
Transfer of Hunter Mountain would protect the airspace from the military.

September 27, 1988
Lone Pine, Ca

RESPONSE TO

2. Michael Ushman
See Introduction on page 4-1 of EIS.

3. Nadeen Naylor
Under Modified Alternative A, Hunter Mountain would be retained in the CDCA for management by BLM.

4. Stan Haye
See response to written comment 46-1.

5. Roger DeHart
See response to written comment 49-1.

6. Mary DeDecker
The "little lily" appears to be Androstephium breviflorum, however, it has no BLM status.

8. Michael Prather
See response to written comment 46-1.

9. Sophia Ann Merk
NPS management policies (9181) direct parks to protect and maintain native species and ecosystems. It is extremely unlikely that exotic species would be encouraged in natural zones of any NPS unit, nor would state or federal agencies consider exotics for listing as threatened or endangered.

See response to written comments 68-1 and 89-13.

The National Monument ceiling for military aircraft is 3000 feet under an agreement between the Department of Defense, Federal Aviation Administration and National Park Service.

Furnace Creek Inn is a private development on private lands, and it was developed in the 1920's prior to establishment of the Monument. See response to written comment 64-1.

Lone Pine (cont..)

12. Janice Allen
Uncertain if the Hunter's water rights would be loss if not exercised.

13. Keith Bright
The minerals on Hunter Mountain and Greenwater Valley are important to Inyo County future tax base.

14. Roy Hunter
The DEIS does not address water rights upon death.

15. Ray Siegele
The DEIS does not address private land or established uses.

September 28, 1988
Tecopa Hot Springs, Ca

1. Gilber Helfer, Brian E. Baumunk, Ethel Messer, Paul Watkins (Citizen and represents Death Valley Chamber of Commerce), Rae Ann French, Bella Miska, and Mike Dougherty
Each is against the proposed land transfer.

2. Charles H. Delight
Enlarging the Monument will result in a tax loss.

3. Richard F. Mole, Armavi Mining Co.
Mining enterprises are not possible with transfer to Death Valley National Monument.

4. Charles Blenman, Inyo Minerals
Concern with the tax revenue loss to Inyo County.

5. Fred C. Johnson
The Park Service has acquired mining claims outside of the part boundary.

There is gold in the Old Greenwater mining district which was not noted in the DEIS.

Mineral evaluation by the BLM geologist relies on history of past production.

There is a trend in the Greenwater Valley Wilderness Study Area which was not discussed.

There is disagreement with the BLM classification system and the State of California classification system.

RESPONSE TO

12. Janice Allen
See response to written comment 64-1.

13. Keith Bright
See page 4-17 of EIS.

14. Roy Hunter
See response to written comment 64-1. Mr. Hunter's water rights on Hunter Mountain are appropriative, which means they may be bought, sold, disposed of or passed on to his heirs upon his death.

15. Ray Siegele
See response to written comment 91-2.

September 27, 1988
Tecopa Hot Springs, Ca

RESPONSE TO

11. Fred C. Johnson
Exactly the opposited is true. The NPS has, in fact, recently turned down several offers of property donations which were located outside of Monument boundaries. The only exception to this which the NPS is aware of occurred during a land transaction in 1973. This land transaction involved the acquisition of a group of 83 claims (1,222 acres within Monument. At that time one claim, a small fraction (consisting of only 3.8 acres) outside Monument boundaries was mistakenly transferred to the Park Service. However, the intent of the NPS not to include this claim with the other 83 is clear in the correspondence on this subject. Several times National Monument personnel requested that the claim be dropped from the transaction. The final transaction was apparently not checked closely enough, and the claim was transferred to the Park Service. This situation was only recently brought to NPS attention and the agency is working to correct it.

Your comment has been noted and modification made.

See response to written comment 87-2.

See response to written comment 87-3

See prior response. The BLM classification scheme for mineral potential differs from that of the State. For simplicity, areas lacking sufficient data to classify are also lumped into the "low potential" category. No classification scheme is perfect owing to the problem of insufficient data. In an area of several hundred square miles, one would expect to find some zones of low potential. Plate 3 of the State report (open file report 86 10 SAC) does not show any labeled as such.This likely is because they chose to lump this category into zone"MRZ 4", a noncommittal classification. For the purpose of the DEIS BLM refers not to use the term "not determined".

WRITTEN COMMENTS RECEIVED AND RESPONSES

The BLM received 115 letters addressing the Draft EIS during the public comment period. All letters received were reviewed. Substantive comments (those that presented new data, questions or issues bearing directly on the effects of the proposed land transfer to the Monuments) were responded to, and where appropriate, Draft EIS sections were revised. Table 5-2 lists each comment letter and identifies its assign reference number. Individual substantive comments within each letter were identified and responses were prepared for these comments. The responses, which accompany each letter, are keyed to the appropriate comment by the reference numbers that appear on the comment letter.

All comment letters have been reprinted verbatim, and all substantive comments have been addressed in this Final EIS. Letters that did not address environmental issues but presented an opinion are acknowledged by their inclusion.

Table 5-2

List of Comment Letters

Letter Number	Source of Letter
1	Robert E. Reynolds, San Bernardino County Museum
2	Walter B. Powell, Southern Council of Conservation Clubs
3	Juanita O. Hunter
4	Margery W. Horsfall
5	Shasi Kumar, Engineer, California Regional Water Quality Control Board
6	Bernie and Carol Mauldin, California Federation of Mineralogical Soc.
7	Norman Johnson
8	Mr. and Mrs. B.W. DeBus
9	Erika Nowak
10	James R. Huning
11	Kenneth H. Taylor
12	Dr. and Mrs. Daniel Steinberg
13	Peter Burk, Citizens for Mojave National Park
14	William V. Peterson
15	Mr. and Mrs. Francis J. Johnston
16	Ed Holm
17	Dell Rechling, Evergreen Valley College
18	James V. Lewis
19	Lawrence M. Jacobson
20	John Johnson, County of Riverside
21	Andrew J. Smatko, M.D.
22	Christopher D. Rea
23	L. Buchanan, Sovereign Explorations, Inc.
24	Mark C. Jorgensen, California Dept. of Parks and Recreation
25	Helen Michaelis, University of California, Los Angeles
26	Robert M. Kanne
27	Chuck Elderton
28	Eileen S. Ceo
29	Suzanne E. Taylor
30	Robert B. Kistler and Eugene D. Smith, U.S. Borax
31	Laura Woolley Smith
32	The McMurray Family
33	Russell D. Butcher, National Parks and Conservation Association
34	Arne D. Koski
35	William E. Rine, Bureau of Reclamation
36	Mrs. Gay Gotses, California WHOA!
37	Alfred H. Kramm
38	Lowell E. Brown, Jr.
39	Kenneth B. Jones, California Department of Parks and Recreation

40 Mike Dougherty
41 Robert Kistler, U.S. Borax
42 Robert S. Campbell
43 Harry Metzger
44 Harry Metzger
45 Richard G. Rayburn, California Department of Parks and Recreation
46 C. Craig Baker
47 Anita Marie Osborn
48 Tom H. Peil
49 Christine T. Mead
50 Robert P. Martinez, Office of Planning and Research, State of California
51 Gordon F. Snow, The Resources Agency of California
52 Dennis J. O'Bryant, California Department of Conservation
53 Pete Bontadelli, California Department of Fish and Game
54 Bruce Jensen
55 Tom and Susan Hedges
56 Ms. H.W. Edwards, Sierra Club
57 Sherri Rogers
58 Robert S. Joe, Los Angeles District, Corps of Engineers
59 Andrea Bowman
60 Patrice Davision, California Assoc of 4WD Clubs Inc.
61 Brian Buttazoni
62 James D. Colt
63 Gayle A. Orner
64 Jim Macey and Bud Monroe
65 Jim Macey, Inyo Co Coalition for Balance Thought of Public Domain
66 Jim Macey and Bud Monroe
67 Neddeen Naylor, Lone Pine Paiute-Shoshone Reservation
68 Raymond Lopez
69 Deanna M. Wieman, U.S. Environmental Protection Agency
70 Stella L. Rook
71 Daniel Cronkhite, Sagebrush Press
72 F.C. Lentz, Jr., R 2508 Complex Control Board
73 Douglas A. Shearer
74 Harry P. Drabkin
75 Jim Dunne
76 Suzanne C. Taylor
77 Harry Peck
78 John R. Swanson
79 Richard A. Weaver, Desert Bighorn Council
80 D'Arcy P. Banister, U.S. Bureau of Mines
81 Robert Wickinson
82 Richard M. and Eva S. Keller
83 Nancy M. Kaufman, U.S. Fish and Wildlife Service,
84 Christopher S. Haynes
85 Carmelita Swarts, The San Diego Mineral and Gem Society, Inc.
86 Scott F. Keys, Inyo-Mono County Farm Bureau
87 Paul Watkins, Fred Johnson, and Martha Watkins, Death Valley Chamber of Commerce

88 Barbara Cordero-Hill
89 Ron Schiller, et al, High Desert Multiple-Use Coalition
90 William R. Maddux, Gear Grinders Four Wheel Drive Club
91 The Schiller Family
92 Sophia Anne Merk
93 Mary L. Grimsley
94 Orlo J. Anderson, Kaiser Steel Corporation
95 H. Marie Brashear, National Outdoor Coalition
96 Fred Johnson, American Borate Co.
96 Janice Allen
98 Joy Hunter, Hunter Ranch
99 Harry E. Wilson
100 Vernon C. Bleich, University of Alaska Fairbanks
101 L.C. Haas
102 Richard Spotts, Defenders of Wildlife
103 Vicky Hoover, Sierra Club
104 Vincent Yoder, California Native Plant Society
105 Donald Falk, Desert Survivors
106 Rick Scarce
107 Greg Pelka
108 Steve Tabor
109 Frederick C. Johnson
110 Norbert Riedy, The Wilderness Society
111 Ron Mondt, Mondt/Zierenberg
112 Guy G. Visbal, California Department. of Transportation
113 Judith A. Anderson, Chair, Sierra Club
114 John W. Ross and Sheila Massey, California Cattlemen's Association
115 Gary N. Cottrell, County of Riverside

SAN BERNARDINO COUNTY MUSEUM

2024 Orange Tree Lane • Redlands, CA 92374
(714) 792-1334 • 792-0052 • 825-4825 • 825-4823

COUNTY OF SAN BERNARDINO
GENERAL SERVICES AGENCY

DR. ALLAN D. GRIESEMER
Director

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RECEIVED

8:32

July 10, 1988

Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

re: NPS REQUEST TO ENLARGE DEATH VALLEY NATIONAL MONUMENT

Dear Sirs:

I am concerned about the proposed expansion of Death Valley Monument into the Greenwater Valley area. The Greenwater Valley contains significant nonrenewable paleontologic resources in sediments of Pleistocene Lake Tecopa. These nonrenewable resources necessitate active management to prevent destruction by natural erosion and by unauthorized manmade impacts, including illegal collecting.

The Bureau of Land Management and, in particular, the Barstow Resource Area, is currently encouraging active, interactive management of these resources through their permitting process and working in conjunction with local
1-1 museums. I am not aware that the National Park Service is involved in the active management of significant nonrenewable paleontologic resources nor in encouraging access to NPS lands by agencies assisting in such management programs. The Bureau of Land Management, through its district offices and Resource Area Managers and staff, has been aware and responsive not only to passive protection of resources but of interagency involvement and cooperation in their active management and protection.

The Lake Tecopa paleontologic resources are considered to be extremely significant (see, for example, Reynolds, 1987, in Abstracts of proceedings, 1987 Mojave Desert Quaternary Research Symposium, SBCMA Quarterly XXXIV(3,4):64-65). Resource protection procedures and philosophies might be disrupted with a change in land management agencies, and significant nonrenewable paleontologic resources could suffer irreparable impacts during or after such a transition. If this area is transfered to NPS, I would strongly suggest that paleontologic resource sites in the area be inventoried and a plan for management be developed by BLM prior to such transfer.

Sincerely,

Robert E. Reynolds
Curator, Earth Sciences

Response

1-1 Although NPS policy does not encourage NPS units to actively seek research of paleontological resources, a procedure through the Antiquities Act (1906) exists for approval of and cooperation on bona fide research projects. An application was submitted by University of California, Berkeley, Department of Paleontology in March 1985 and approved in April 1985. Subsequent permits have renewed this research through 1989. Loans of paleontological specimens to museum collections have also been arranged through this process.

THE VOICE OF ORGANIZED SPORTSMEN

Southern Council of Conservation Clubs, Inc.

"IN UNITY THERE IS STRENGTH"

MEMBER OF CALIFORNIA WILDLIFE FEDERATION

2

815 Rim Road
Pasadena, CA, 91107
July 24, 1988

Mr. Gerry Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA, 92507

Dear Mr. Hillier:

Please do not transfer any Multiple-use BLM land to the National Park Service to enlarge the Death Valley and Joshua Tree National Monuments, or for any other purpose.

The lands which the NPS would like to acquire are part of the land that was thoroughly studied when the current Desert Plan was developed. At that time compromises were made, and a balanced allocation of land to multiple-use, to restricted use, and to single-purpose use was agreed upon.

To transfer current multiple-use land to the NPS without trade for or replacement with land having equal recreational and wildlife habitat value would subvert all the work and the integrity of the compromises that went into the preparation of the current Desert Plan.

I know of no land which has been offered for trade or replacement.

The NPS proposal is strictly a one-way street. They get multiple-use land to convert to their purposes, and nobody else gets anything in return.

Under Park Service management:
 a. Hunting would not be recognized as a game management tool, or as a compatible recreational activity, and would not be allowed.
 b. The sportsmen's multiple-use effort in the installation of watering devices would be wasted by the NPS policy of non-maintenance and repair.

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CONSERVATION – WISE USE OF OUR NATURAL RESOURCES
WITHOUT WASTE AND WITHOUT ABUSE.

2-1 The NPS argument that it would be beneficial to consolidate management of particular Bighorn Sheep populations under one agency (namely, NPS),ignores the alternative of shifting the boundaries so that BLM could manage the population, or the possibility of reaching an interagency agreement for the coordinated management of the sheep populations for the benefit of the sheep.

The NPS argument also ignores the fact that the BLM can also control burros and cattle where there is a demonstrated need, as when they are impacting the Bighorn Sheep habitat, food, and water, and where cattle are transmitting diseases to the sheep.

In view of the policies and the record of the National Park Service in managing public land for habitat, wildlife, and recreation values, the Southern Council of Conservation Clubs asks that the Bureau of Land Management reject completely the one-sided proposal of the Park Service to transfer existing BLM Multiple-Use recreation land to the Park Service for incorporation into Death Valley and Joshua Tree National Monuments.

Sincerely,

Walter B Powell

Walter B. Powell, Vice President
Southern Council of Conservation Clubs

Response

2-1 The proposal by the Western Regional Office of the National Park Service did not include shifting the Monuments' boundaries. Cooperative agreements regarding wildlife have been developed with other agencies, usually through a Habitat Management Plan. Hunter Mountain does not have a HMP at this time. However, bighorn sheep management was not the only rationale of NPS, see page 2-5.

L.P.

WRITTEN STATEMENT

ENVIRONMENTAL IMPACT ANALYSIS PROCESS

BISHOP RESOURCE MANAGEMENT PLAN

3

(Submit to BLM representative at Scoping Meeting or mail to: Bureau of Land Management, Bishop Resource Area, Attn: Holden Brink, 787 N. Main St., Suite P, Bishop, CA 93514. Mailed statements should be submitted by August 1, 1988.)

Please forward my comments to MR Bill Haig: in the Ridgecrest Resource area:

Regarding the proposal to enlarge DV NATL Monument by adding Hunter Mtn.

To me there are no good reasons to do this. If this happens we lose the freedom of a wilderness experience that you have now. You add unnecessary & unwanted restrictions. There are already plenty of designated parks with neat little camp grounds. Hunter Mtn. is natural with natural wildlife to observe, hunt, take pictures of & enjoy.

The argument about fire control is rediculous. The only fires out there have been beneficial.

Regarding livestock grazing - It should continue for economic reasons - (keeping the price of beef ~~with~~ within the reach of everyone) There are those who feel, done correctly, it is (GRAZING) beneficial to the country. Seeing real cowboys is a thrill for tourists to behold, especially foreig. & if you do this, (put this into a monument) it is the next thing to putting my family out of the cow business. More on ~~see~~ this in a different letter.

Submitted By:
JUANITA O. HUNTER
Name (please print)

PO Box 26
Street Address

Olancha Calif 93549
City State Zip

MARGERY W. HORSFALL
1037 OXFORD DRIVE
PLACENTIA, CALIF. 92670

4

California Desert Dist. BLM July 31, 1988
Attention Monuments EIS
1695 Spruce St
Riverside, Ca 92507

Dear Sirs,

In regard to your July 19, 1988 "BLM invites public comment on Park Boundary adjustment proposals", I would like some further information. I can't attend any of formal hearings.

Have any of the park boundary proposals any connection with Cranston's former bill? I am completely opposed to Cranston's bill but understand it will come up again. Are the change valid proposals that really make area more natural and manageable? My experience has been the Parks Dept that that dept is stretched very thin and they are not able to manage their present areas. Multiple use of BLM has worked out well and should be left alone. Cranston was originally including Negaoc Basin area but that is not in current discussion? What is the relationship between proposed change & Cranston proposal?

Sincerely,
Margery W. Horsfall
address above

STATE OF CALIFORNIA GEORGE DEUKMEJIAN, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN • REGION 7
73-271 HIGHWAY 111, SUITE 21
PALM DESERT, CALIFORNIA 92260
Phone: (619) 346-7491

ROUTING
DATE INIT.
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ACTION BY:
RETURN TO:

5

August 2, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Re: Draft Environmental Impact Report (EIR) for Boundary Adjustments; Death Valley and Joshua Tree National Monuments.

The Regional Board staff has reviewed the subject draft EIR, dated July 1988. This office does not have comments to offer at this time.

If you have any questions, please contact me at (619) 346-7491.

Shasi Kumar
SHASI KUMAR
Staff Engineer

SK/sw

File Ref.: EIR

Bernie and Carol Mauldin, Members
California Federation of Mineralogical Soc.
Public Lands Advisory Committee
1036 Chestnut Avenue
Redlands, Calif. 92373
August 1, 1988

6

California Desert District BLM
Attn: Monuments EIS.
1695 Spruce St.
Riverside, Calif. 92504

Gentlemen:

Objectively and humanely the better alternative for the resources involved in the Monuments EIS is E. Comparing past management records of both agencies places BLM out front. It makes good sense to keep in charge those doing the best job. To add work to the group that is barely effective in doing 19% of its present tasks can only lower their performance further.

FIRES: BLM's program allows grazing and the collecting of firewood for camping. Both of these practices lowers the amounts of fuel available for forest fires. Both are good management practices. BLM also actively fights forest fires. The Park Service is anti-grazing and allows no firewood collecting. It also follows the policy of letting forest fires burn themselves out. Both animals and plants are safer in a responsible controlled environment.

HABITAT ENHANCEMENT: BLM builds and repairs water guzzlers, clears waterways and springs, monitors wildlife: NPS does none of these things. Sensitive wild life such as the Big Horn Sheep are known to thrive on this small amount of attention. In fact, all animals and plants will die without water.

HUNTING: BLM allows hunting in season subject to State and Local Laws: NPS does not. Controlled hunting of specified animals provides an excellent means for controlling overpopulation while adding a recreational activity to the Public Lands.

MINING: BLM allows mining subject to the mining laws. Mines and mining on NPS lands finds the landlords very unfriendly. Small family mines and those showing only a marginal profit are the first casualties on NPS lands. Charges for tonnage on roads, permits, Bonding and proof of minability are a few of the ways mines are closed. The 211,000 acres in this proposal have a high mineral potential of strategic and critical resources. Our defensive strength needs this production. NPS control would cost jobs, close mines, reduce critical production and make us more dependant on foreign sources.

ROCK HUNTING: BLM allows rock hunting on BLM and Wilderness lands: NPS does not. The multiple use policy of BLM provides needed recreation for many compatable activities, while retaining control of fragile areas and endangered species.

We urge alternative E and the retention of control by BLM.

Sincerely,

Bernie & Carol

Bernie and Carol Mauldin

7

[redacted] August 2, 1988 CDD

Dear Mr. Hastey,

Your News Release asks what I think about the proposal that the BLM and the NPS get together on boundry adjustments for Joshua Tree and Death Valley Monuments. I think it's great! (You don't often get together.)

The NPS represents preservation, wherein the BLM in its multiple use formula tries to be all things to all people -- and succeeds in being a loss to most.

But while I hope you attain your noble ends in this, I have a stronger hope that Senator Cranston's S-7 will one day prevail in the Senate. For if we do not preserve the little that is left of our unique national lands in our time, that little will be lost to future generations; perhaps lost forever.

Concerned citizen,

8/3/88-

B.L.M.

My husband & I are
definitely in favor of
increasing Death Valley N.M.
& Joshua Tree Nat'l Mon.
& including the acres
in the parks -

Mr. & Mrs. B. Wm DeBus
(Jonie)

56062 Golden Bee
Yucca Valley, Ca 92284

Erika Nowak
Rt. 2 271A Winchester, TN 37398

july 29. 1988

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 AUG -4 PM 1:22
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

9

California
Desert District
Bureau of Land Management
Attn. Monuments EIS
1695 Spruce Street
Riverside. California 92507

Gentlemen:

I am delighted that transfer of five parcels of public lands to the Death Valley and Joshua Tree National Monument is presently in consideration, and I urge you to continue with your efforts until these plans can be realized.

I have been travelling through these areas and was overwhelmed by their beauty. Even if I don't live there, I want these areas to be protected for future generations and I strongly believe that the National Park Service will be able to do that in an excellent way.

Thank you for work and your considerations concerning these areas and for keeping me informed about it.

Sincerely,

Erika Nowak

RECEIVED
[illegible] AUG -4 PM 1:16
[illegible] DISTRICT
CA.

10

3 August 1988

California Desert District
Bureau of Land Management
1695 Spruce Ssst.
Riverside, CA 92507

Attn: Monuments EIS

Since the resource data have been collected by the BLM for the CDCA, I have been tracking the developments and policies that affect the California Desert. I wish to go on record in support of the proposed boundary adjustments which would transfer a total of 207,000 acres to Death Valley National Monument and 4,500 acres to Joshua Tree NM.

For Death Valley NM my priorities are:

1) North Death Valley
2) Pyramid Peak
3) Hunter Mountain
4) Greenwater Valley.

Sincerely,

James R. Huning

James R. Huning, Ph.D.

1307 Indiana Ave.
South Pasadena,
California 91030

Aug 1, 1988

11

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 AUG -4 PM 1:28
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District, BLM
Attn Monuments EIS.
1695 Spruce St. Riverside, CA. 92507

I am writing to express my comments about the proposal to add 211,000 acres to the Death Valley and Joshua Tree National Monuments.

I have traveled on Hunter Mountain and have observed numerous mining camps that could be put into production following the market change in metal prices. I also know of deposits of rare earth minerals namely the mineral Monazite on Hunter Mountain. I do not know about the other areas, but I sincerely believe you should have a team of competent mineralogists and geologist survey the area for minerals crucial to americas needs, before withdrawing the area. It is Cranston's bill S.7. in thin disguise—

Sincerely
Kenneth A. Taylor

216 W. ROBERTSON RD.
RIDGECREST, CA 93555

12

FOR THE HEARING RECORD

Aug 6, 1988

Dear Sirs,

We would like our names included in the hearing record supporting the proposed transfer of 211,000 acres of BLM-managed lands to the National Park Service's Death Valley and Joshua Tree National Monuments.

Having spent 3 weeks visiting these areas over the past winter, we heartily concur that they need management under a single jurisdiction, rather than being artificially divided.

Sincerely yours

Dr. and Mrs. Daniel
Steinberg

CITIZENS FOR MOJAVE NATIONAL PARK

P. O. BOX 106 BARSTOW, CA. 92311

13

California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce St
Riverside, CA 92507

Dear Mr Hillier; 8/5/88

Thank you for sending us a copy of of the Monuments draft EIS. We support the transfer of BLM lands to the NPS.

We are deeply disappointed that this draft EIS failed to recommend transference of the 1.5 million acre East Mojave National Scenic Area to the National Park Service. Our organization has been active for 12 years to transfer these 1.5 million acres to NPS.

We support the transfer of North Death Valley, Hunter Mountain, Pyramid Peak, Greenwater Valley and Pinto Basin to the NPS. In addition, we also support the transfer of Saline Valley, Owlshead Mountains, Eureka Dunes, Darwin Falls, Panamint Dunes, Eagle Mountains, Funeral Mountains, Little San Bernardino Mountains and Coxcomb Mountains to the NPS.

We support President Reagan declaring a 1.5 million acre Mojave National Monument from EMNSA (under the Antiquities Act).

Please keep us informed on this process.

Sincerely,

Peter Burk

Peter Burk, President

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BUREAU OF LAND MANAGEMENT
1988 AUG -8 PM 1:38
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Calif. Desert District
Bureau Land Management
attention; Monuments E.I.S.
Riverside, California.

August 5, 1988

14

Dear Sirs;—

In regard to the 207,000 Acres of Land adjoining the ~~Jo~~ Joshua Tree & Death Valley Monuments -- I support the transfer of this land to the Park Service.

I support the National Parks & Conservation Assoc. in this matter.

Sincerely!

William V. Febus
213 Holcombe Ave. N.
Litchfield,
Minnesota
55355

25 West Pennsylvania Avenue
Redlands
CA, 92374

August 8, 1988

15

California Desert District, BLM
Atten: Monuments EIS
1695 Spruce Street
Riverside
CA, 92507

We are in receipt of the BLM News Release for July 19, 1988 that refers to the proposals for boundary adjustments at Joshua Tree and Death Valley National Monuments.

This is to express our unqualified support of the plan to release 211, 000 acres from the Bureau of Land Management to the National Park Service for such adjustments. We are particularly interested in the 4,500 acres on the south side of Joshua Tree National Monument that would be added to Pinto Basin. This natural area was very rich in early man sites. There are probably many parts of it that have yet to be professionally surveyed.

Thank you for this opportunity to comment.

Sincerely yours,

Francis J Johnston

(Mr.&Mrs.) Francis J. Johnston

August 8, 1988

16

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, California 92507

Dear BLM Representatives,

Your proposal to transfer some of the BLM desert lands to National Park Service jurisdiction is a good one.

As everyone knows, BLM lands are extensive and the personnel available for their supervision are limited. The lands around JTNM which are proposed for transfer to the Park Service are particularly sensitive from an ecological viewpoint.

If the proposed lands are transferred to the Park Service, it is reasonable to expect that NPS personnel will assimilate these new lands and form larger parcels requiring the same care and attention they have previously provided their existing lands.

Large land masses under one jurisdiction are less likely to suffer the erosion which befalls smaller units of land.

Yours truly,

Ed Holm

Ed Holm
3802 Vineyard Drive
Redwood City, Calif 94061

Evergreen Valley College

3095 Yerba Buena Road
San Jose, California 95135-1598
(408) 274-7900

President
Gerald H. Strelitz, Ed.D.

Chancellor
R. W. Goff

17

BCM

Dear Sirs:

I'd like to express my concerns about expanding the Nat'l Park boundaries in Death Valley and Joshua Tree. I teach a natural science class every Spring to Death Valley. One of our daily trips is over Hunter Mountain thru Saline Valley. I strongly advise addition of this area to the park as we have seen much evidence of abuse and need for better road maintenance and patrol. That is a wonderfully scenic and educational loop thru to Ubehebe. also Greenwater Valley offers many scenic vantage points, but needs some maintenance of roadways as well: another great loop could be offered thru Saratoga Sp.

I'm familiar with the other areas and with increasing population use of parks. we need to be forward looking and set aside special areas like these for protection from exploitation.

Thanks

Dell Rehling
Instructor

PS Please keep me informed w/ copies of any proceedings.

RECEIVED
1988 AUG 10 AM 11:52
DISTRICT

Governing Board—Charles R. Blackmore • Richard A. Bowers • Robert M. Giuli • Mary Ruth Gross • Charlotte Powers

8/5/88

18

BLM
California Desert Dist.
Attn; Monuments EIS.

I strongly approve of the proposed additions and boundary adjustments to the Joshua Tree & Death Valley National Monuments. Keep ORV out.

Thank you
James V. Lewis

MR JAMES V LEWIS
3401 MARS RD NE
ALBUQUERQUE, NM 87107

1988 AUG 11 PM 1:49

19

Dear EIS Reviewers, 8/10/88

I'm in favor of the proposal to transfer the appropriate properties to Death Valley Nat. Mon and Joshua Tree Nat. Mon. These additions appear to be a more natural boundary than what exists now. The new additional lands will help retain a part of the California desert in its primeval state for future generations.

Sincerely,

Lawrence M. Jacobson

LAWRENCE M. JACOBSON
2628 115th WAY S. W.
OLYMPIA, WASH. 98502

20

OFFICE OF THE ROAD COMMISSIONER AND COUNTY SURVEYOR
COUNTY OF RIVERSIDE

LeRoy D. Smoot
Road Commissioner and
County Surveyor

County Administrative Center
Mailing Address: P.O. Box 1090
Riverside, Ca 92502
Telephone - (714) 787-6554

August 9, 1988

Bureau of Land Management
California Desert District
1695 Spruce Street
Riverside, CA 92507

ATTN: Monuments EIS

RE: Park Boundary Adjustment Proposal

Dear Sirs:

The Riverside County Road Department has reviewed the project referenced above and requests an opportunity to review and comment on the EIS.

If you desire additional information, contact me at (714) 787-1445.

Sincerely,

John Johnson
Associate Planner

JJ:AE:lg

21

ANDREW J. SMATKO, M.D.
2001 [redacted] SANTA MONICA BOULEVARD, SUITE [redacted] 590W
SANTA MONICA, CALIFORNIA 90404
829-4561

OBSTETRICS AND GYNECOLOGY

8-23-88

California Desert District
Riverside, CA.

Sirs;

I would like to make a public comment regarding the proposed additions to Death Valley National Monument and Joshua Tree National Monument.

I have two comments regarding this proposal, and they concern public access to these regions. I have driven along the dirt road through North Death
21-1 Valley and thoroly enjoyed the views and vistas afforded by this journey. Question - Will this existing road be closed to future travel? If so, then I am against including North Death Valley into the Monument. The same goes for Hunter Mountain, Greenwater Valley and Pinto Basin. Public access to these scenic areas should not be restricted or curtailed. What is the use of a Park or Monument if one cannot gain access to these scenic parts?

It would also be nice if one would be allowed to "camp" in these proposed additions - as it exists
21-2 at present, or failing this, would the Park Service establish one or more primitive camping areas in each of these proposed additions?

Otherwise I have no objections to these additions to Death Valley Monument or Joshua Tree Monument.

Yours truly,
A. J. Smatko, M.D.

Response

21-1 This road would remain open if the parcel were transferred to the NPS.

21-2 Camping would be permitted in this area under NPS management. It would be managed according to NPS camping policies which are listed on page 2-17 of the EIS.

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8/22/88

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Sirs:

I have reviewed the Environmental Impact Statement for boundary adjustments of Death Valley and Joshua Tree Nat'l Monuments and am in agreement with the transfers of land. The proposed additions to the Death Valley and Joshua Tree Nat'l Monuments appear to be a compromise of Senator Alan Cranston's S. 7 Bill from a conservative viewpoint. I also think that in the not too distant future these lands will become a part of Death Valley and Joshua Tree National Parks. However, I am in opposition to S. 7 and the creation of "Mojave National Park". The BLM has already done adequate studies of "Wilderness Areas" in the eastern Mojave Desert. Thank you for making the Environmental Impact Statement available to the public, I will share it with those who have interest in this area.

Sincerely,

Christopher D. Rea

Christopher D. Rea
Eagle Scout, B.S.A., Troop #19
B.A., Biology, C.S.U.S.B.
Research Assistant, L.L.U.

Sovereign Explorations, Inc.

[illegible] Reno, Nevada, U.S.A. 89502 Telephone (702) [illegible]

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August 26, 1988

California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Ladies and Gentlemen:

I oppose the transfer of two parcels of public land, currently administered by the BLM, to the Park Service. The lands are known as Pyramid Peak and Greenwater Valley, both near the eastern edge of Death Valley National Monument.

Our company has spent well in excess of $100,000 in 1988 evaluating the mineral resources of those parcels, and we had planned to spend $500,000 in 1989. The seemingly insatiable need to withdraw lands from multiple use appears to have no end in this country, and it is especially ludicrous and economically damaging when well mineralized areas such as these are withdrawn.

23-1 If these lands are withdrawn, Baker and Death Valley Junction will not only lose out on our proposed exploration expenditures, but would also lose the millions of dollars in jobs and development expenditures we planned to make should our efforts be rewarded by discovery of an orebody.

Sincerely,

L Buchanan

L. Buchanan

LB:hls

A Wholly Owned Subsidiary of

TOTAL ERICKSON

North Vancouver, British Columbia, Canada

Response

23-1 The loss of jobs and tax base is addressed on page 4-19.

STATE OF CALIFORNIA—THE RESOURCES AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF PARKS AND RECREATION

Mark C. Jorgensen
Anza-Borrego Desert State Park
Box 299
Borrego Springs, CA 92004
(619) 767-5311

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24

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

August 18, 1988

BLM:

Thank you for the opportunity to comment on the EIS concerning the transfer of lands from BLM to Death Valley National Monument and Joshua Tree National Monument.

I am in full agreement with the National Park Service's proposal to acquire through transfer, 247,329 acres of lands presently held by the BLM. I discussed plans along these lines with Peter G. Sanchez in the early 1970's. It was felt at that time and remains valid today, that to properly manage Death Valley NM, the entire ecological units should be held by a single managing agency.

The natural and cultural resources held within the proposed parcels are of National Park integrity and should rightfully be transfered.

The issues of cattle grazing allotments and mineral rights do not match the environmental resource importance of these properties. It's time to look at the economic reality of grazing cattle on public lands--especially arid lands. It doesn't pay any way you look at it. Most often the revenues from grazing do not even pay the salaries of those overseeing the allotment program, namely the range conservation officer and associated administrative staff. 24-1
Impacts from cattle grazing on public lands are catastrophic to the plant communities and native wildlife, as well as the quality of the land for recreational pursuits. To continue subsidies to small ranching operations is doing them no favor in the long term. The nation no longer needs the beef these small time operators are producing. The market is flooded by more cost efficient operators from the southeastern states and it's time to realize it.

The people will be well served by the proposed transfer of lands to Death Valley NM and Joshue Tree NM. The quality and protection for the future will be well enhanced as our state comes under more and more recreational and developmental pressures in the next century.

Sincerely,
Mark C. Jorgensen
Mark C. Jorgensen
Naturalist

Response

24-1 The Public Rangelands Improvement Act established an experimental grazing fee formula. The Bureau of Land Management and the Forest Service are operating under this law. The fee formula was established in 1978, and Congress has not enacted another grazing fee or fee system since that time.

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO

SANTA BARBARA · SANTA CRUZ

25

ROCK ART ARCHIVE
THE INSTITUTE OF ARCHAEOLOGY
LOS ANGELES, CALIFORNIA 90024

AUGUST 24, 1988

CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
ATTN: MONUMENTS EIS
1695 SPRUCE ST.
RIVERSIDE, CA. 92507

GENTLEMEN:

THANK YOU VERY MUCH FOR SENDING US THE "DRAFT ENVIRONMENTAL IMPACT STATEMENT- BOUNDARY ADJUSTMENT :DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS". IHAVE READ THIS VOLUME VERY CAREFULLY, BUT I WAS RATHER DISAPPOINTED ABOUT THE SCARCITY OF COMMENTS ON "CULTURAL RESOURCES".

I HAPPEN TO HAVE LOOKED FOR ROCK ART IN BOTH DEATH VALLEY AND THE GREENWATER VALLEY WHICH IS BEING CONSIDERED AS AN ADDITION TO DEATH VALLEY. THE LATTER HAS A VERY INTERSTING AMOUNT OF ROCK ART IN SEVERAL LOCATIONS. I WAS THERE QUITE SOME TIME AGO AND HAVE STILL TO LOOK FOR MY SLIDES OF THAT TRIP. I HOPE TO BE ABLE T OSEND COPIES OF SAME TO YOU BEFORE THE DEADLINE.

VERY SINCERELY YOURS,

Helen Michaelis

HELEN MICHAELIS
CURATOR
ROCK ART ARCHIVE

9/5/88

26

Dear BLM

Just thought I would add my two cents. I support the proposed transfer of 211,000 acres from BLM management to National Park Service management. These are the areas that you have identified in North Death Valley, Hunter Mountain, Pyramid Peak, and Greenwater Valley.

I think additional areas should also be transferred, but I'll leave that discussion for another time.

Thanks for the opportunity to comment.

Sincerely,

Bob Kanne

ROBERT M. KANNE
5975 KINGSBRIAR DRIVE
YORBA LINDA, CA 92686

California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

RECEIVED

September 7, 1988

27

Dear BLM:

I am writing in concern for the transfer of additional BLM lands to the National Park Service. As an avid off-road motorcyclist I am concerned that this action will adversely impact my chosen form of recreation. The Park Service has historically been more restrictive of off-road vehicle use than the BLM; therefore, I am opposed to the land transfer.

Although much of the land proposed for transfer may not now be available for off-road travel, the Park Service will likely further restrict our use of the land. Please consider my concerns, as well as those of others who share my enjoyment of off-road motorcycling in your study. The California Desert Plan has proven a valuable tool for providing balanced use of our desert - please continue to honor it.

Thank You

Chuck Elderton
309 Martinvale Lane
San Jose, CA 95119

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ACTION BY:
RETURN TO:

Eileen Ceo
126 Newport Dr.
Oak Ridge, TN 37830

September 7, 1988

28

BLM Calif. Desert District
1695 Spruce St.
Riverside, CA 92507

Attn: Monument EIS

To whom it may concern;

In regards to the (EIS) to add lands to Death Valley and Joshua Tree National Monuments, I support the "No action" alternative E.

Sincerely,
Eileen S. Ceo

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 SEP 12 PM 12:58
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

28

29

Suzanne E. Taylor
3200 Stonewood Court
Fullerton, California 92635

BLM - Desert District
1695 Spruce St.
Riverside CA 92507

attn Monument EIS

I need a copy of Draft Env.

Impact Statement to add lands to

Death Valley & Joshua Tree Nat'l

Monuments for my records.

sent 9-14-88 elw

I support "NO Action"

alternative E.

Please reply.

Thank you
Suzanne E. Taylor

29

30

U.S.BORAX

ADM
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AMs
ACTION BY:
RETURN TO:

September 12, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

RE: MONUMENTS EIS

Gentlemen:

As a follow-up to our letter of June 15, 1988 and after further analysis of the mineral potential of the Pyramid Peak, Greenwater Valley and North Death Valley areas, we submit the following comments on the proposed boundary adjustments to Death Valley National Monument (DVNM).

PYRAMID PEAK

As stated in our letter of June 15, 1988 and as stated in your Draft Environmental Impact Statement (3-38 and 39), U.S. Borax owns 240 acres in T.26 N., R 3 E, S.B. B. & M described as the S 1/2 SW 1/4 Sec. 16, SE 1/4 SE 1/4 Sec. 17, NW 1/4, NW 1/4 Sec. 20, and N 1/2 NW 1/4 Sec. 21 in accordance with the Henry Washington survey of 1857. The 1940 independent survey of the Monument boundary placed the land in T. 26 N, R. 3 E. approximately one mile north of its location when said land was patented in 1935 and 1938.

It is U.S. Borax position that it owns the land as originally acquired and that our Travertine Point property should not be placed in or adjacent to National Monument and/or Wilderness. The Travertine Point property and its source of water are important to the future development of U.S. Borax's Death Valley area borate reserves and as such would not be compatible with the scenic values cited in your draft Environmental Impact Statement (EIS) (4-18).

As also stated in our letter of June 15, 1988, that portion of the Pyramid Peak parcel located south of the estimated line of the Furnace Creek Fault is part of a zone of borate potential. As shown on the attached map of the Main Zone of Borate

UNITED STATES BORAX & CHEMICAL CORPORATION • 3075 WILSHIRE BOULEVARD • LOS ANGELES, CA 90010-1294 • (213) 251-5400
MAIL ADDRESS: P.O. BOX 75128, SANFORD STATION, LOS ANGELES, CA 90075-0128

Potential, East Death Valley Area, the projected trace of the Furnace Creek Fault is approximately parallel to and about one mile northeast of Highway 190 in this area.

30-1 Based on the information given in your draft EIS on the borate potential of this area (3-44 and 4-20) and our own geologic mapping and exploration programs, it is our position that the south boundary line of the Pyramid Peak parcel should be placed at least one mile northeast of Highway 190. (see map attached)

GREENWATER VALLEY

30-2 This large area, portions of which include the old mining camp of Greenwater, has potential for the discovery of borates and possibly other saline minerals at depth. Much of this area has never been explored by modern exploration methods, specifically drilling, and for the most part, geologic map coverage is poor.

It is our position that only the area from Greenwater Spring south be considered at this time for addition to DVNM and that the boundary be placed one mile west of the Furnace Creek Wash road. (see map attached)

NORTH DEATH VALLEY

This is a large, poorly explored, area with potential for borates and saline minerals. It is our position then this area has greater value for its mineral potential that it does as an addition to DVNM. In our opinion its remote location and ordinary terrain will limit its use by visitors and its value for Monument purpose.

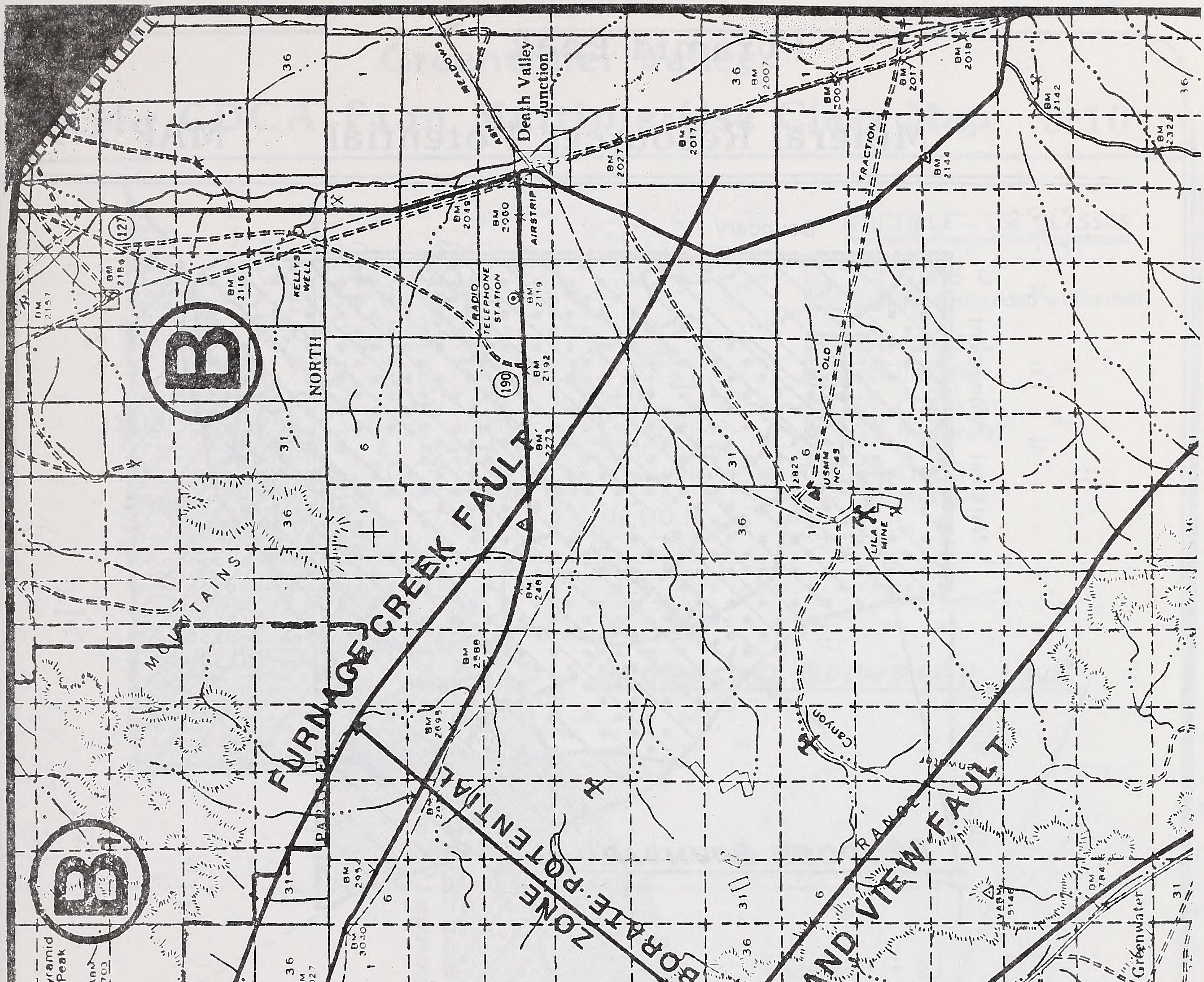
Sincerely,

Robert B. Kistler
Chief Geologist

Eugene Smith
Eugene D. Smith
Vice President
Government & Public Affairs

EDS:RBK:gw

Encl.
cc: Mr. Ed Hastey


FURNACE CREEK FAULT
GRAND VIEW FAULT
BORATE POTENTIAL ZONE
DEATH VALLEY NATIONAL MONUMENT
Death Valley Junction
Pyramid Peak
Travertine Point
STANDARD
GREENWATER
MOUNTAINS
NORTH
RADIO TELEPHONE STATION
AIRSTRIP
KELLYS WELL
LILA C MINE
WIDOW MINE
Canyon
RANGE
TRACTION
OLD
MEADOWS
Greenwater
Lemonade Spring
Mount Perry
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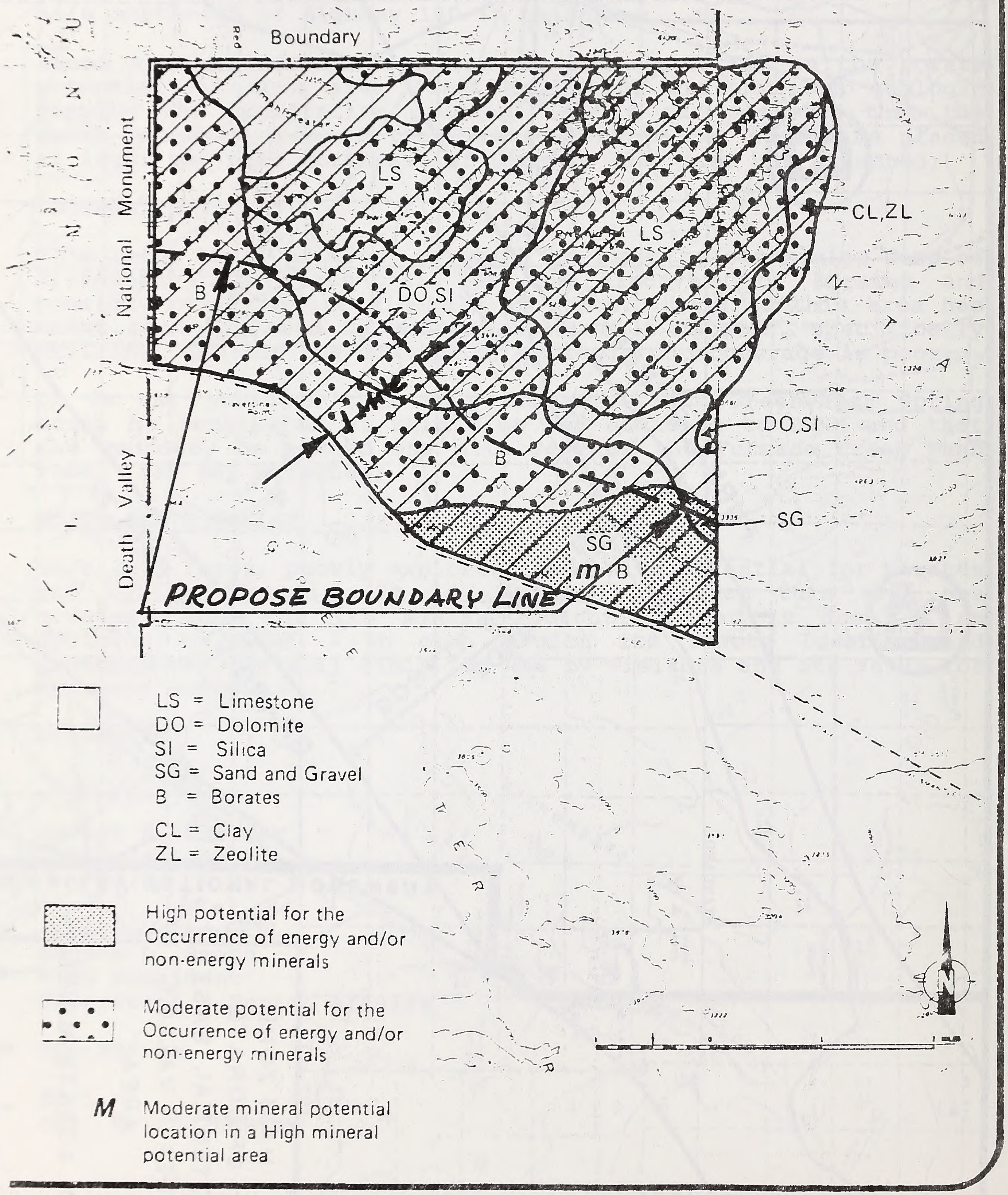
MAIN ZONE OF BORATE POTENTIAL EAST DEATH VALLEY AREA

Pyramid Peak

Mineral Resources Potential

MAP 3-9


Boundary
National Monument
Death Valley
LS
LS
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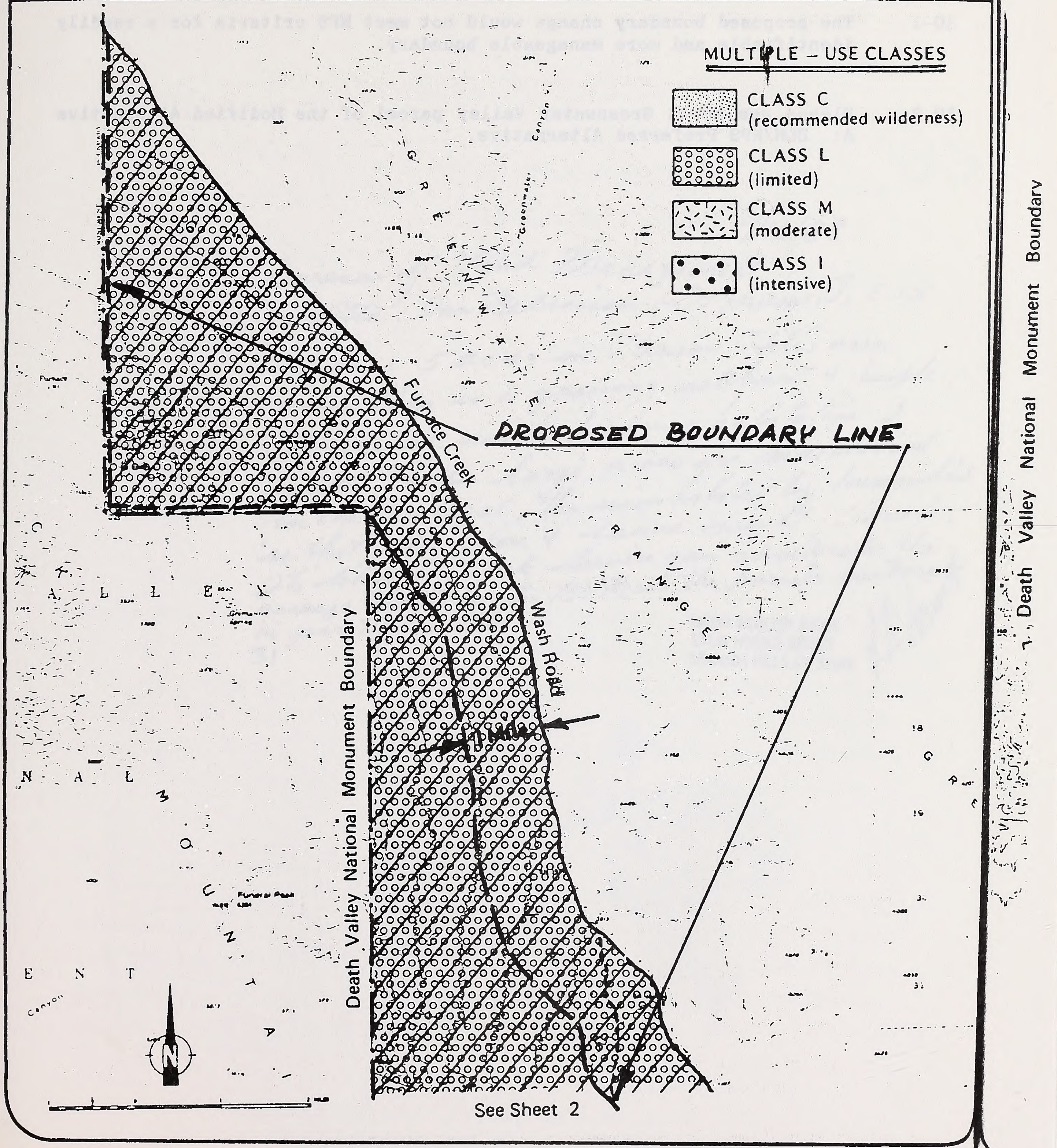
SG
m B
PROPOSE BOUNDARY LINE
LS = Limestone
DO = Dolomite
SI = Silica
SG = Sand and Gravel
B = Borates
CL = Clay
ZL = Zeolite
High potential for the Occurrence of energy and/or non-energy minerals
Moderate potential for the Occurrence of energy and/or non-energy minerals
M Moderate mineral potential location in a High mineral potential area
N

Greenwater Valley

BLM - CDCA Plan Multiple-Use Class Map 3-10


MULTIPLE – USE CLASSES
CLASS C (recommended wilderness)
CLASS L (limited)
CLASS M (moderate)
CLASS I (intensive)
PROPOSED BOUNDARY LINE
Furnace Creek
Wash Road
1 Mile
Greenwater Canyon
GREENWATER RANGE
VALLEY
Funeral Peak
Death Valley National Monument Boundary
Death Valley National Monument Boundary
N
See Sheet 2

Sheet 1 of 4

Response

30-1 The proposed boundary change would not meet NPS criteria for a readily identifiable and more manageable boundary.

30-2 Please see North Greenwater Valley parcel of the Modified Alternative A: BLM/NPS Preferred Alternative.

31

9/16/88

Bureau of Land Management
Attn: Jan Bedrosian - Monuments EIS
I have 5 acres in Pinion Hills area
where there is a growing settlement & people.
Interspersed with human-habitation I
would hope large areas are maintained
for the natural, the uninhabited by humankind
so that the flora & fauna might flourish.
It's likely the Park Service can administer the
acreage better than the BLM as to the parcels mentioned
in your 7/19/88 letter.
31

LAURA WOOLLEY SMITH
17430 HORACE STREET
GRANADA HILLS, CA 91344

L W Smith

32

California Desert District
BLM
Attn: Monuments EIS
1695 Spruce Street
Riverside, Ca 92507

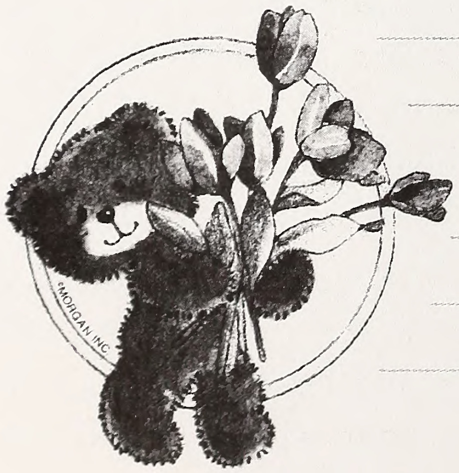
Public Comment

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 SEP 21 PM 1:26
CAL. DESERT DISTRICT
RIVERSIDE, CA.

Dear Sirs,

We are in favor of the addition of 211,000 acres to the Death Valley National Monument and Joshua Tree.

Sincerely
The McMurray Family



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ACTION BY:
RETURN TO:

RUSSELL D. BUTCHER
Southwest-&-California Representative

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September 20, 1988

NATIONAL PARKS AND CONSERVATION ASSOCIATION'S COMMENTS ON BLM'S DRAFT EIS ON PROPOSED BOUNDARY ADJUSTMENTS: DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS

Following testimony at
BLM public hearing,
Riverside, California,
September 19, 1988

My name is Russell D. Butcher. I am the California-&-Southwest Representative of National Parks and Conservation Association, a nonprofit membership organization founded in 1919 to promote the protection, enhancement, and public understanding of the National Park System and related public lands. We appreciate the opportunity to offer comments on the BLM's Draft Environmental Impact Statement (EIS) on proposed boundary adjustments at Death Valley and Joshua Tree National Monuments, dated July 1988.

For a number of years, we have carefully studied and recommended various possible options for expanding and improving the boundaries of Death Valley and Joshua Tree National Monuments. In most instances, the boundaries of these monuments follow straight or zig-zag section lines which, therefore,

(more)

bear little or no relationship to topographical, ecological, or man-made realities on the face of the land. In addition, such straight lines all-too-often arbitrarily cut through the middle of some mountain, valley, or other natural feature--dividing its management between two separate federal agencies.

The four proposed transfers of BLM units to Death Valley National Monument, and the one proposed to Joshua Tree National Monument would certainly help to remedy several of these long-standing boundary problems.

North Death Valley unit, comprising 84,389 acres, is an extremely high priority. After 55 years, the northernmost end of Death Valley proper would finally be brought into the monument. We urge, as we have for several years, that this area is a logical and important boundary adjustment that will enable the National Park Service (NPS) to protectively manage the whole of the nationally significant geological unit of Death Valley.

Greenwater Valley unit, comprising 117,505 acres, is another very high priority. It would shift part of the monument's present section-line boundary eastward, thereby bringing under NPS management the entire range of the Black Mountains, only part of which is now within the monument; and would establish the boundary along an identifiable feature--the Furnace Creek Wash Road.

While this would be a vast improvement over the present boundary, we have been recommending shifting this stretch of boundary even farther eastward so that all of Greenwater Valley and most of the scenically spectacular Greenwater Mountains would be under NPS's protective management. We urge careful evaluation of this option.

(more)

Pyramid Peak unit, comprising 14,268 acres,(which would become part of our proposed Greenwater Valley unit, above), is an excellent proposal to bring into the monument the southerly end of the Funeral Mountains, Red Amphitheater, and Pyramid Peak; and to shift the present arbitrary section-line boundary southeastward to a more topographically related location. Of the two Pyramid Peak alternatives, we favor the one described under Alternative A: Proposed Action, as it appears to establish a simpler, more manageable boundary than the one suggested under the Modified Pyramid Peak Proposal (Alternative D). However, either option would be far preferable to the present boundary.

Hunter Mountain unit, comprising 26,687 acres, is another worthy boundary shift that would move the present boundary, which arbitrarily divides (between NPS and BLM) the management of this ecologically significant mountain plateau in the Panamint Range. Under this plan, all of the area would come under NPS's protective management; and much of the new boundary would logically follow a road in Grapevine Canyon. A number of NPS resource management programs would be enhanced--including fire management, wildlife management, and the cattle trespass problem. Regarding the latter, one
33-1 major benefit would be the greatly reduced risk of the transmission of diseases (notably of blue-tongue) from cattle to the desert bighorns.

We have also studied and recommended a number of other possible boundary adjustments at Death Valley National Monument. These include a shift to bring into the monument parts of the Owls Head Mountains that are arbitrarily sliced out of the south end of the monument; a slight shift to bring into the monument the Saddle Peak Hills, just outside the southeast corner; and other tracts along the westerly boun-

(more)

dary where present section-line boundaries are unmanageable and/or exclude certain key values that could enhance the overall quality of the monument.

The one proposed transfer from BLM to Joshua Tree National Monument--the 4,480-acre Pinto Basin unit, is an extremely high priority that our Association has long advocated. This relatively small boundary adjustment would finally bring back under the NPS's protective management the only part of Pinto Basin that (among other lands) was deleted from the monument in 1950. The unit would not only add this part of the broad basin that is a central topographical/hydrological/ botanical feature of the monument, but it would shift the present arbitrary section-line boundary outward to existing roads that would help enhance the monument's manageability.

We also have previously supported and now strongly urge transferring from BLM to Joshua Tree National Monument the adjacent Eagle Mountains unit (Alternative C)--most of which was within the monument prior to 1950. This rugged, wild area, which provides habitat for an outstanding population of desert bighorns, offers the opportunity of shifting the arbitrary north-south section-line boundary eastward to a far more topographically oriented location.

As we also mentioned at the September 19th public hearing, our Association recognizes some serious trespass access problems from Coachella Valley into the southern part of Joshua Tree National Monument. We urge that management could be greatly enhanced by shifting the present arbitrary zig-zag section-line boundary southward to a more definable, simpler, and more logical location, such as along the Colorado River Aqueduct right-of-way. A large part of this area, encompassing

(more)

the Cottonwood Mountains and extending along a stretch of the aqueduct right-of-way, was within the monument until 1950. As for the checkerboard land-ownership pattern in this area, we are pleased to be encouraging a number of land exchanges of checkerboarded private and state interests--notably in BLM's East Mojave National Scenic Area; in a dozen of BLM's wilderness worthy WSA's, in Grand Canyon National Park, and elsewhere in Arizona; and in the El Malpais National Monument/National Conservation Area, in New Mexico. We consequently do not share the Draft EIS's conclusion here that the presence of checkerboarding should result in dismissing this area from being proposed for addition to Joshua
33-2 Tree National Monument. If the tract is worthy on its merits for a boundary adjustment recommendation, as we believe it is, then it should be so recommended. Working out an exchange of checkerboarded interests should be a relatively routine effort.

And finally, we continue to urge that the northeasterly corner of Joshua Tree National Monument be expanded so that the entire area of the scenic Coxcomb Mountains can be given NPS protective management. While we understand that the present section-line boundary follows fairly closely a watershed divide along the highest point of the Coxcombs, we believe--as with the above-mentioned Greenwater Valley unit proposal at Death Valley wherein all of the Black Mountains would be added to NPS management and the boundary shifted to a road--that entirety of the Coxcombs and on outward to roads would provide a boundary that would be obvious on the land. This boundary adjustment would add somewhat to the NPS's management responsibilities; but we feel the benefits to the monument make this proposal worthwhile.

Having suggested several additional boundary adjustments

(more)

beyond those of the Draft EIS's Alternative A, we want to point out, neverthless, that National Parks and Conservation Association appreciates BLM's willingness (for whatever reason) to sit down and review the options for boundary adjustments with the National Park Service; and to recommend a set of proposals to transfer certain lands from its own jurisdiction to the NPS. This is a unique strategy for the BLM, and we want to do all we can to encourage such initiatives and such constructive inter-agency cooperation.

Please let us know if we can be of any help as this process proceeds.

* * *

Response

33-1 Please see response to 114-4

33-2 Please see response to 113-4.

34

9/22/88

Sirs:

No thank you. It smacks to me of a land grab, and why???

Why would these Nat. Monuments need 330 sections more?

I must admit that expansion of the monuments is better than wildness area, but why?

Arne I Koski

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ACTION BY:
RETURN TO:

United States Department of the Interior

TAKE PRIDE IN AMERICA

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

35

IN REPLY
REFER TO:
LC-159
ENV-6.00

SEP 2 0 1988

Memorandum

To: Mr. Gerald E. Hillier, District Manager, California Desert District, Bureau of Land Management, 1695 Spruce Street, Riverside CA 92507
Attention: Monuments EIS

From: Regional Environmental Officer

Subject: Review of Draft Environmental Impact Statement (EIS) for Boundary Adjustments--Death Valley and Joshua Tree National Monuments--July 1988 (EIS)

We have reviewed the subject draft EIS and find that the Bureau of Reclamation has no lands in the immediate vicinity of the area proposed. We have no other comments to offer.

Thank you for the opportunity to review the EIS.

William E. Rine

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ACTION BY:
RETURN TO:

36

September 21, 1988

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, Calif. 92507

Dear Sirs:

It is difficult for an environmentally concerned organization to be at odds with a proposal that should help protect that environment that WHOA! is involved with. But because of the National Park Service's management policies in regards to wild horses and burros, WHOA! must oppose the acquisition of any habitat by NPS that would have a negative impact upon those animals.

The Hunter Mountain area that is being included as Parcel Two in the boundary adjustments in the proposed transfer of public lands currently managed by the Bureau of Land Management, adjoins the Lee Flat Herd Management Area that has been set aside by BLM for approximately 30 burros. Livestock is also currently allowed under grazing allotments that will be continued even under NPS until those leases expire. Will 30 burros be blamed for the overgrazing of considerably more cattle? If the cattle wander into the Hunter Mountain area there is a proposal 36-1 to provide fencing to prevent this. If the burros happen to do the same wandering the National Park Service has proposed to take care of them with their management techniques - guns.

The burro has been accused by many of destroying habitat by over-populating and over-eating. What little research there has been has proved this to be somewhat untrue and atypical behavior of Equus asinous. If the burro is producing more than the carrying capacity of his environment can withstand (and at times he has), is this an indication that something is wrong with the species? Has human activity caused this? Is there something else wrong within that habitat? Is the lack of research on burros indicative of other areas that might also be in want of scientific study? Is the human concept of what "belongs" in a national park too human?

The burro is not as romantically and aesthetically regarded by humans as the big horn sheep, nor does he hold the same monetary values as livestock. However, if the fossil records are studied he is as oddly native and perhaps as "beautiful" in his own design. He deserves and has long needed extensive, unbiased research based upon his being a burro. Lee Flat Herd = research area?

WHOA! applauds all efforts to protect the delicate ecosystems within our southwestern desert ranges and national monuments that are in California. We will continue to oppose that protection if the National Park Service continues to suggest that wild horses and burros are best "managed" with bullets.

Yours truly,

Gay Gotses

Mrs. Gay Gotses
California WHOA! Representative
24756 Perseus
Mission Viejo, Calif. 92691

GG

CC: Dawn Lappin

Response

36-1 As stated on page 2-18 of the EIS in item 7: "Wild horse and Burro Act constraints do not apply on National Park System (NPS) land. Animals would be subject to removal or direct reduction." Direct reduction efforts for the feral burro population within the monument are the last phase of a live removal program prescribed in the monument's 182 Natural and Cultural Resources Management Plan (NCRMP). This live removal program, begun in 1983, was a three-year cooperative effect between NPS, BLM and a consortium of participating animal protection groups. Although time proposed for removal of burros was three years, NPS provided animal protection groups adequate time to capture additional animals prior to direct reduction efforts.

If the North Death Valley parcel were to transfer to NPS management, a similar phased removal plan would be developed. This would include live removal, direct reduction and also could include maintaining the existing fencing at Sand Springs and construction of fence along the new boundary in the north of the parcel.

37

Alfred H. Kramm
5190 East 28th Street
Long Beach, California 90815
25 September 1988

Bureau of Land Management
1800 Cottage Way,
Sacramento, Calif 95825
¯ C1/ Select

SUBJECT: Comment on Park Boundary Adjustment Proposals.
I strongly recommend that BLM DECLINE to transfer any BLM managed lands to the National Park Service.

The public lands currently under consideration for transfer to the National Park Service are managed for Multiple Use by BLM. Once they are in the hands of the Park Service, all mining and rockhounding and other similar activities will cease to exist.

In 1964 and in the 70s Congress passed legislation that permitted Wilderness Designations within the Park System and stopped mining. As the public is beginning to percieve in 1988, this was shortsighted.

The Park Service, more than most other Federal Services,have embraced a policy of "cockamanie" notions from environmental theorists. This year the public has witnessed half of the 2.2 million acre Yellowstone National Park, the "crown Jewel" of 1872,reduced to charcoal and ashes.¯ Under Wilderness rules, there are no roads, no chain saws, no motorized vehicles, no chemicals, no low flying aircraft through or over a Wilderness.. You don't fight a lightning fire in a Wilderness. You let it burn itself out. And you don't harvest the burnt timber after the fire is out !

Pretty "cockamanie" wouldn't you say ? Some of our Congressmen think so too....Maybe we'll see some changes ? We hope.

Environmentalists are in a ferment about the emissions to the atmosphere from coal burning Electric Generating plants; but so far I haven't heard a whisper (from them) about the emissions of 3.6 million acres of charred forest lands this past summer.

Of course Death Valley and Joshua Tres National Monuments are nothing like the forests of Yellowstone. But there could be grass and brush fires. If BLM's transferred lands are closed to access, as the rest of these monuments are, there would be a great loss to recreation, rockhounding and mining. To be sure these transferred lands will be closed.

37-1 Has anyone coredrilled North Death Valley, Hunter Mountain , Pyramid Peak, Greenwater Valley and Pinto Basin ? Nobody will be able to, under Park Service management !

We know already that both Greenwater Valley and Pinto Basin are heavily mineralized; Greenwater has a large deposit of Borox; Pinto has copper minerals, hemitite and Jade. That we know, and no doubt there are many more minerals of value to our nation and rockhounds.

Please do not transfer BLM multiple use lands to the Park Service. Their management policy is misguided.

Alfred Kramm

Sincerely yours, Alfred H. Kramm

Response

37-1 Pyramid Peak and Greenwater Valley (Parcels 3 and 4) have not been coredrilled to any extent. This concern is addressed on page 4-23 for Parcel 4. The narrative for Parcel 3 has been modified to reflect this concern.

Dear BLM,

Sept. 25, 1988

I am in favor of the proposed boundary adjustments to Death Valley and Joshua Tree National Monuments. The addition of 211,000 acres of land currently administered by the BLM to the monuments to create more manageable boundaries and put natural areas and ecosystems/drainages under a single agency's jurisdiction makes a lot of sense!

Lowell Brown Jr.

P.s Could you please change the address you have for me for mailing information regarding the California Desert Conservation Area? My present address is:

Lowell E. Brown, Jr.
P.O. Box 900
Three Rivers, CA 93271

State of California
The Resources Agency of California

39

Memorandum

Date : September 22, 1988

To : Richard G. Rayburn
Chief
Resource Protection Division

From : Department of Parks and Recreation
Southern Region Headquarters

Subject: The Monuments, Bureau of Land Management
Draft Environmental Impact Statement

These comments are regarding the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) of The Monuments (July, 1988). This action proposes to transfer 5 parcels of BLM land to the jurisdiction of the National Park Service at Death Valley and Joshua Tree National Monuments. The action totals 247,329 acres, and is proposed so that the boundaries of each monument are more manageable and so that natural areas and ecosystems are managed under a single jurisdiction.

The Southern Region strongly supports this action, and recommends the DPR reflect this support to the BLM along with the following comments on the DEIS:

39-1 1. When a wildlife guzzler is no longer operative for any reason, its repair and/or replacement should be considered on a case by case basis. If the guzzler reestablishes an historic water source previously eliminated through human activity, the guzzler should be considered a "permanent" feature.

39-2 2. It appears that only small portions of each parcel have been surveyed for archeological sites. Further archeological studies are warranted in order to formulate informal management plans.

Thank you for the opportunity to comment, and please include these comments and support in the Department's response to BLM.

Kenneth B. Jones, Regional Director
Southern Region

Attachment

RECEIVED
SEP 26 1988

8-6118

Response

39-1 As outlined in the Memorandum for the Record, pages AG-1 through 4 in this document, any guzzler situation entered into by the NPS would be evaluated on a case-by-case basis to determine whether the guzzler would be maintained or replaced when it is no longer operative. Consideration that a guzzler "reestablish an historic water source previously eliminated through human activity" will be a necessary part of this evaluation. Any guzzler inherited by the NPS would be maintained and replaced, if need be, if it was determined that the guzzler had become a critical water source for bighorn or other native wildlife. For information regarding the NPS policy on establishing artificial water sources in areas, see the discussion under comment 53-1.

39-2 Executive Order 11593 requires inventory and evaluation of prehistoric and historic resources on all Federal lands. NPS lands are undergoing archaeological survey and inventory as funding permits. About 10% of Death Valley National Monument has been surveyed. A survey strategy is being developed to prioritize and cover large blocks of land within the Monument boundaries. Any additional lands would be included in this plan.

40

ROUTING TO:	DATE	INIT.
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ACTION BY: RETURN TO:		

Mike Dougherty
Box 44
Baker, CA. 92309
619-733-4551

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA. 92501
September 26, 1988

re: "Attention Monument EIS"

Dear Bureau of Land Management,

I write to ask you not to transfer BLM lands to Park Service for addition to the National Monuments.

I ask that these lands be held by the Bureau for the present and future use of our citizens rather than closed off and locked away by the protectionist policies of the National Park Service.

I well know the areas of Pyramid Peak and Greenwater Valley that are under consideration for transfer. I have walked these lands. I have driven the trails. I have been in the mines under these lands. I like this country. I feel that the land is a part of me, and I am a part of the land.

Please don't screw it up.

It's difficult to write about how I feel about our desert lands. It is hard to coldly write down feelings of the heart and values of the spirit. It's particularly difficult when I suspect that of all that are involved in the decision of how these lands should be managed, none have ever spent 24 continuous hours upon these lands. That again, the true values of the lands shall be judged by those that know them least.

Have you seen Death Valley during times of intense use? Have you seen the parking lots and campgrounds jammed with RVs, looking like aluminum beer cans stuffed into a Skinner box? The signs... The rules... Camp here - Don't camp here - Only daylight camping here - Generators here - No generators here - Dump here - Don't dump here - Ad nauseam - Ad nauseam.

But at the same time, in Greenwater Valley, a few hardy souls park along the dirt roads to camp unrestricted under the free desert sky. No rules - No neighbors, No regimentation.

A child may gather fuel for a campfire without being branded a criminal by an overworked Park Ranger. A father can teach his son to shoot. A mother can teach her daughter to gather herbs and flowers without fear of being cited by ever watchful Park Rangers.

Families can point their vehicles down lonesome desert trails and explore the lands that stretch unguarded into the horizon.

This is a fine use of these lands, BLM lands. If these lands pass into Park Service controll will we ever again be able to drive through the lost towns of Furnace, Kunze, or Greenwater?

40

Will we ever again be able to drive down the roadbed of the Death Valley Rail Road and visit the old labor camps? There are still telegraph poles here. There are tumbled down buildings, old dumps, bits of clothing can still be found.

Have you ever driven to the top of the cliff behind New Ryan and used your binoculars to walk through the old town stretched out so far below? Have you walked along that same cliff and found where some 20 years ago a hippie worked all day arranging the rocks to spell out the word PEACE?

Have you followed the old drilling and survey roads along the plateau until you could drive, ever so carefully, into the rock strewn floor of Lizard Canyon? As the trail rises out of Lizard Canyon, setting in the middle of the road is a 1947 DeSoto automobile. Have you seen it? Will anyone ever see it if Park Service protects it?

Have you driven down Greenwater Valley and turned off for the canyon? Have you seen the petroglyphs? Have you seen the rock carvings done by the crew locating the benchmarks in 1948? Have you driven down Greenwater Canyon awed by the fantastic sandstone shapes carved by the winds?

There's history in that canyon... The Boomers walking up from the Tidewater and Tonapah Rail Road to seek their fortunes in the copper mines of Greenwater... The first cars and trucks in the desert straining through the sands of the canyon hauling passengers and equipment, hearalding the demise of the pack and wagon trains...

Can we again hear the laughter of Diamond Toothed Lil? Have you seen the unmarked grave on the hill above Petroglyph Canyon? Do the spirits of Dad Fairbanks and Charles Brown still walk the abandoned camps?

I can't say enough about how I value these lands. How I value the freedom to explore them, to share them with friends, to introduce visitors to the experiance of the open desert.

Please, BLM, do not place these lands in the all protecting hands of the National Park Service. They would protect these lands from the people who love them the most.

Truly yours,

Mike Dougherty

Mike Dougherty

41

ROUTING TO:	DATE	INIT.
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TECHNICAL DEPARTMENT

US BORAX

September 27, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Attention: Monuments EIS

Gentlemen:

I oppose the proposed Boundary Adjustments for Death Valley and Joshua Tree National Monuments.

The proposed BLM Park Boundary Adjustment Proposal includes three areas where our Company has had exploration programs in recent years. Therefore, I feel I have some grounds for comment on the mineral potential of Greenwater Valley, Pyramid Peak and North Death Valley, all adjacent to Death Valley National Monument. I object specifically to the road being used as the boundary in Greenwater Valley and Pyramid Peak.

Greenwater Valley: This large area, portions of which include the old mining camp of Greenwater, has potential for the discovery of borates and possibly other saline materials at depth. Much of this area has never been explored by modern exploration methods, specifically drilling, and geologic map coverage is poor for the most part. I would suggest that only the area from Greenwater Spring south be considered at this time and that the boundary be placed one mile west of the road.

Pyramid Peak: While much of this area is rugged limestone cliffs, the area near the road contains our Travertine Point property and a water well site that is important for the future development at Ryan. The proposed addition to DVNM should therefore be drawn back from the road by at least one mile, which would still add about 24 square miles to the Monument.

North Death Valley: This is another large, poorly explored area with potential for borates and saline minerals. Its remote location and ordinary terrain will limit its use by visitors and its inclusion would remove yet more land from mineral entry.

UNITED STATES BORAX & CHEMICAL CORPORATION · 3075 WILSHIRE BOULEVARD · LOS ANGELES, CALIFORNIA 90010 · (213) 381-5311
MAIL ADDRESS: P. O. BOX 75128, SANFORD STATION, LOS ANGELES, CALIFORNIA 90075

In general, I oppose any land withdrawals that are made simply to remove land from multiple use as this proposal seems to do.

Thank you for the opportunity to comment.

Sincerely,

Robert B. Kistler

ROBERT B. KISTLER
Chief Geologist

/eji

42

814 LA PORTE
LA CANADA, CA 91011
30 SEPT 88

CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
ATTN: MONUMENTS EIS

I WISH TO COMMENT ON THE PROPOSED LAND TRANSFERS DESCRIBED IN THE MONUMENTS EIS, IN PARTICULAR PARCEL 3: PYRAMID PEAK. THE PYRAMID PEAK PARCEL CONTAINS A BGG WHICH PROVIDES VALUABLE WATER FOR DEER, BIGHORN SHEEP, AND OTHER ANIMALS. THE MONUMENTS EIS STATES (p 4-17):

> "SHOULD ANYTHING CATASTROPHIC HAPPEN TO THE PYRAMID PEAK BGG IT WOULD NOT BE REPAIRED. THE LACK OF WATER WOULD RENDER A LARGE AREA OF BIGHORN HABITAT UNUSABLE, AND IT CAN REASONABLY BE INFERRED THAT THIS WOULD LEAD TO FURTHER POPULATION DECLINE."

OVER THE PAST 20 YEARS HUNDREDS OF VOLUNTEERS LIKE MYSELF HAVE CONTRIBUTED THEIR LABOR TO THE CONSTRUCTION OF THESE BGG'S. I HAVE RETURNED TO THE BGG AT PYRAMID PEAK SEVERAL TIMES FOR ROUTINE INSPECTIONS. IT IS MOST DISHEARTENING TO THINK THAT THIS WATER SOURCE MAY BE ABANDONED TO EVENTUAL DISREPAIR.

THE EIS NOTES THAT THE BIGHORN POPULATION IN DVNM HAS DECLINED FROM 900 TO 400 IN THE LAST 25 YEARS (p 3-37). IN SPITE OF THIS SIGNIFICANT DECLINE IN THE MONUMENT, THE BIGHORN POPULATION IN THE STATE HAS INCREASED FROM ABOUT 3800 TO 4800 IN THE SAME PERIOD. THIS INCREASE IS DUE TO THE WILDLIFE MANAGEMENT POLICIES OF THE BLM AND THE CALIFORNIA DEPT. OF FISH AND GAME, A MAJOR ELEMENT BEING THE INSTALLATION OF BGG'S IN DESERT MOUNTAINS. THE EIS STATES THAT THE DECLINE IN BIGHORN POPULATION WITHIN THE MONUMENT CAN BE EXPECTED TO CONTINUE (p 3-37). INDEED THIS POPULATION DECLINE WILL CONTINUE IF WE PLACE MORE BIGHORN HABITAT UNDER NPS MANAGEMENT.

THE NPS RATIONALE FOR THE PYRAMID PEAK PARCEL TRANSFER MAKES THE FOLLOWING POINTS (p 2-7):

> "ACCESS TO OTHER PARTS OF THE MONUMENT COULD BE MANAGED BETTER"

THIS DOES NOT MAKE SENSE; THERE ARE NO ROADS IN THE PARCEL WHICH PROVIDE INGRESS TO THE MONUMENT.

> "MORE COHESIVE MANAGEMENT WOULD BE PROVIDED FOR A POPULATION OF BIGHORN SHEEP"

IN THIS INSTANCE, MORE COHESIVE MANAGEMENT WILL LEAD TO LESS DEER AND BIGHORN SHEEP.

> "IT WOULD PRODUCE A MORE RECOGNIZABLE PATROL AND MANAGEMENT BOUNDARY"

SUPPOSE WE HAVE A MORE RECOGNIZABLE BOUNDARY, AND WITHIN THAT BOUNDARY THERE ARE LESS DEER, LESS BIGHORN, AND LESS RECREATIONAL OPPORTUNITIES. THE NPS MANAGEMENT

STAFF IS THE ONLY ENTITY HAVING ANYTHING TO GAIN BY THIS PROPOSAL; THE WILDLIFE AND THE PUBLIC LOSE.

THE EIS ASSERTS THAT THE PARCEL PRIMARILY SERVES AS A SPECTACULAR SCENIC BACKDROP TO MOTORISTS ENTERING DVNM (p 3-41). IT IS MORE THAN THAT; IT IS HOME TO THE DEER, BIGHORN, AND OTHER WILDLIFE LIVING IN IT. THEY WILL BE BETTER SERVED BY CONTINUATION OF THE WILDLIFE MANAGEMENT POLICIES OF THE BLM AND THE DEPT. OF FISH AND GAME.

R Campbell

ROBERT S. CAMPBELL

43

Harry Metzger
227 Ashlar Drive
Napa, CA 94558

70 5/8

Sept. 27, 1988.

Dear Mr. BLM Manager Hillier,

1. Thank you for your interesting The Monuments Draft EIS, July, 1988.

2. Thank you for your BLM program to construct many guzzlers and develope many springs and wells to increase the numbers of our precious desert wildlife. We need to bring the numbers of our desert wildlife up to the carrying capacity of the desert habitat. Our BLM is doing an excellent job in this.

3. Please continue to send me your BLM desert newsletters, because I am interested in all news and events of our California Desert District. This is a beautiful land.

4. Thank you Sir,
Mr. BLM Manager Hillier.

Sincerely Yours,
Harry Metzger.

- 10 3/4

44

Harry Metzger
227 Ashlar Drive
Napa, CA 94558

Sept. 27, 1988.

Dear Mr. BLM Manager Hillier,

1. I support the BLM proposal to transfer 79,389 acre North Valley Parcel to Death Valley National Monument, because it is a natural geologic, hydrologic, and topographic extension of Death Valley and its ecosystem.

2. I support the BLM proposal to transfer 26,687 acre Hunter Mountain Parcel to Death Valley National Monument, because this would bring the entire plateau under one agency and bring the divided bighorn sheep and mule deer habitats together.

3. I support the BLM Alternative D proposal to transfer 16,757 acre Modified Pyramid Peak Parcel to Death Valley National Monument, because this would produce a better management boundary, better follow the topography, bring divided bighorn sheep habitats together, and eliminate a possible long, narrow area protrusion.

4. I support the BLM Alternative B proposal to transfer 87,174 acre Modified Greenwater Valley Parcel to Death Valley National Monument, because this would bring bighorn sheep habitats together, improve the monuments eastern boundary and improve the protection of the monuments water resources.

5. I support the BLM Alternative C proposal to transfer 37,195 acre Eagle Mountains Parcel and Pinto Basin Parcel to Joshua Tree National Monument, because this would produce better management of both parcels.

6. Please use this letter for your monuments program.

7. Thank you Sir, Mr. BLM Manager Hillier.

Sincerely Yours, Harry Metzger.

45

STATE OF CALIFORNIA—THE RESOURCES AGENCY
GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO 94296-0001

(916) 324-6421

September 28, 1988

Gerald E. Hilliar, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hilliar:

The Department of Parks and Recreation has reviewed the Draft Environmental Impact Statement "The Monuments".

The comments from our Southern Region Office are enclosed.

Jan M Doyle
Richard G. Rayburn, Chief
Resource Protection Division

Enclosure

(See Response #39 for the Southern Region Office Response)

October 2, 1988

California Desert District, Bureau of Land Management
MONUMENTS EIS
1695 Spruce St.
Riverside, Ca., 92507

I Support the BLM's proposed land transfers to Death Valley and Joshua Tree National Monuments, But I believe this is only the beginning of what needs to be done to properly manage California's desert lands.

The BLM'S current management policies are jeopardizing the environmental integrity of these lands. The final Environmental Impact Statement (EIS) for the management of the East Mojave Scenic Area and the Draft EIS for the transfer of land from the BLM to the National Park Service are inconsistent in several areas. In these documents, the BLM ignores its own ecological and management bases.

46-1 The boundaries involved are arbitrary and do not include lands which belong in the National Park System because they are of National Park quality for scenic, archaeological, historic, scientific, and recreation reasons. Examples include the Saline and Eureka Valleys, and the Owlshead and Greenwater Mountains.

Because the process of preparing the above mentioned documents was hurried, I believe the BLM should withdraw them in order to prepare more thorough and complete Environmental Impact Statements for all desireable transfers and management decisions.

Thank You,

C. Craig Baker
1519 Boucher
Chico, CA. 95928

46

Response

46-1 The parcels proposed by the Western Regional Office reflected a combination of ecologic and topographic considerations in the context of improved manageability and administration. Although the areas you reference were not proposed by the National Park Service, their inclusion was discussed but later rejected. See pages 2-28, 30, and 31 of this document for an explanation as to why they were rejected from further consideration.

October 2, 1988

California Desert District, Bureau of Land Management
MONUMENTS EIS
1695 Spruce St.
Riverside, Ca., 92507

I Support the BLM's proposed land transfers to Death Valley and Joshua Tree National Monuments, But I believe this is only the beginning of what needs to be done to properly manage California's desert lands.

The BLM'S current management policies are jeopardizing the environmental integrity of these lands. The final Environmental Impact Statement (EIS) for the management of the East Mojave Scenic Area and the Draft EIS for the transfer of land from the BLM to the National Park Service are inconsistent in several areas. In these documents, the BLM ignores its own ecological and management bases.

47-1 The boundaries involved are arbitrary and do not include lands which belong in the National Park System because they are of National Park quality for scenic, archaeological, historic, scientific, and recreation reasons. Examples include the Saline and Eureka Valleys, and the Owlshead and Greenwater Mountains.

Because the process of preparing the above mentioned documents was hurried, I believe the BLM should withdraw them in order to prepare more thorough and complete Environmental Impact Statements for all desireable transfers and management decisions.

Thank You,

Anita Marie Osborn

Anita Marie Osborn
1519 Boucher St.
Chico, CA 95928

Response

47-1 Please see the response to 46-1.

TO. B.L.M.

I SUPPORT YOUR PROPOSED TRANFERS TO DEATH VALLEY AND JOSHUA TREE, BUT THEY ARE ONLY THE BEGINNING OF WHAT NEEDS TO BE DONE. YOUR PROPOSED TRANFERS ARE INADEQUATE AS FAR AS PROTECTING VALUABLE AND IRREPLACEABLE DESERT RESOURCES.

I URGE YOU ADD TO JOSHUA TREE AND DEATH VALLEY NOT ONLY THOSE UNITS WHICH ARE SOUND FOR MANAGEMENT ~~RES~~ REASONS BUT THOSE WHICH BELONG IN THE NATIONAL PARK SYSTEM BECAUSE THEY ARE OF NATIONAL PARK QUALITY FOR SCENIC, ARCHAEOLOGICAL, HISTORICAL, SCIENTIFIC, AND RECREATION REASONS.

THANKS FOR YOUR TIME
TOM H. PEIL
P.O. BOX 8810
TRUCKEE CA. 95737

Christine T. Mead
6508 Simon Way
Paradise, California 95969

October 4, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

ATTN: Monuments EIS

Dear Director:

I am writing to express my support of the Bureau's proposed transfers to Death Valley and Joshua Tree as far as they go but to point out that they are only a beginning of what needs to be done to protect valuable and irreplaceable desert resources. Inconsistencies in the EIS verify the Bureau's inability to adequately protect our desert resources, and the Bureau seems to disregard its own ground rules and ignore its own avowed ecological and management bases for the proposed transfers. The arbitrary nature of the boundaries follows no real logic and fails to include valuable resources.

49-1 I urge you to add to Joshua Tree and Death Valley not only those units which are sound for management reasons but those which belong in the National Park System because they are of National Park quality for scenic, archaeological, historical, scientific and recreation reasons. At a minimum, that would include the Saline and Eureka Valleys and Owlshead and Greenwater Mountains. Senator Alan Cranston's California Desert Protection Act is much nearer the mark, transferring nearly 250,000 acres to Joshua Tree along and adding about 1.3 million acres to Death Valley, in addition to creating a new Mojave National Park.

Also, due to the hurried nature of the EIS, I suggest that the Bureau withdraw it in order to prepare, in its place, a thorough and complete EIS for all desirable transfers.

Thank you for the time and consideration which you have given my letter and recommendations.

Sincerely,

Christine Mead

Christine Mead

49

Response

49-1 The parcels proposed by the Western Regional Office reflected a combination of ecologic and topographic considerations in the context of improved manageability and administration.

50

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

GEORGE DEUKMEJIAN
GOVERNOR

(916) 323-7480

DATE: October 5, 1988

TO: Mr. Doug Romoli
Bureau of Land Management
1625 Spruce Street
Riverside, CA 92507

FROM: Office of Planning and Research
State Clearinghouse

RE: SCH 88060303---Draft EIS, The Monuments, Boundary Adjustments to Death Valley and Joshua Tree National Monuments, Inyo/Riverside/San Bernardino Counties.

As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Robert P. Martinez
Director

Attachment

cc: Applicant

51

Resources Building
1416 Ninth Street
95814
(916) 445-5656
TDD (916) 324-0804

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management Board
Colorado River Board
Energy Resources Conservation And Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

Mr. Doug Romoli
Bureau of Land Management
1625 Spruce Street
Riverside, CA 92507

October 5, 1988

Dear Mr. Romoli:

The State has reviewed the Draft EIS, The Monuments, Boundary Adjustments to Death Valley and Joshua Tree National Monuments, Inyo/Riverside/San Bernardino Counties, submitted through the Office of Planning and Research.

We coordinated review with the California Highway Patrol, Lahontan Regional Water Quality Control Board (Victorville), and Departments of Conservation, Fish and Game, Parks and Recreation, and Transportation.

The Departments of Conservation and Fish and Game (DFG) have provided the attached comments for your consideration. Questions regarding these comments should be directed to Zoe McCrea, Environmental Review Officer, Division of Mines and Geology, Department of Conservation, 1416 Ninth Street, Sacramento, CA 95814, or (916) 322-2562; or Fred Worthley, Regional Manager, DFG, 330 Golden Shore, Suite 50, Long Beach, CA 90802, or (213) 590-5113.

We appreciate being given an opportunity to review this document.

Sincerely,

Gordon F. Snow, Ph.D
Assistant Secretary for Resources

Attachments (2)

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 88060303)

State of California

THE RESOURCES AGENCY OF CALIFORNIA

52

Memorandum

To : Dr. Gordon F. Snow
Assistant Secretary for Resources

Doug Romoli
U.S. Bureau of Land Management
1625 Spruce Street
Riverside, CA 92507

Date : SEP 29 1988

Subject: Draft Environmental Impact Statement for the Monuments, SCH# 88060303

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Statement (DEIS) for The Monuments. Our review was focused on the mineral resource potential of the area proposed for transfer. The following comments are offered for your consideration.

The Hunter Mountain and North Death Valley parcels contain potentially-significant mineral resources. The Wollastonite deposit in the Hunter Mountain parcel, described on pages 3-33 through 3-36, and 4-17 of the DEIS, is recognized as a significant mineral deposit. We concur in this assessment and offer the following additional information on this deposit:

o The Hunter Mountain Wollastonite deposit represents the largest unmined deposit of its type in the United States. As stated in the DEIS, it is a deposit with a proven reserve base of 2,000,000 tons, and an inferred reserve base of 200,000,000 tons, of 60 to 85 percent Wollastonite. It is a world-class deposit.

o Wollastonite currently utilized by domestic industries is supplied entirely by New York producers, who have been operating for many years. Although actual ore reserve figures are not available for the New York deposits, it is likely that these properties are in, or are approaching, a declining ore reserve status.

o Aside from the Hunter Mountain deposit, there are no known domestic sources. Wollastonite would have to be imported from foreign suppliers, probably either China or Mexico (Tom Newman, Huber Corporation, Personal Comm.).

o Wollastonite is currently utilized in plastics as fillers and bonding agents and in ceramic glaze applications. New applications in high strength, impact resistant extrusive plastics are currently being researched. This research, if successful, could have significant technological and industrial implications in the near future.

52

The DEIS proposes a boundary adjustment (mitigation measure 1, page 4-44) for the highly mineralized area around the Crater Mine (North Death Valley Parcel). We note the use of DMG's data for this area, but want to emphasize the potential mineral resource at this site. The Crater Sulfur Mine area is an area of intensive hydrothermal alteration with gold, mercury, sulfur and gypsum mineralization, documented not only by DMG, but also by the U.S. Bureau of Mines and the U.S. Geological Survey. The full areal extent of this epithermal mineralization may not be fully recognized in the proposed boundary adjustment. It appears, based on DMG field data, that mineralization associated with an epithermal system may extend further to the southeast along the Last Chance Range, rather than within the adjusted boundary as noted in the mitigation.

If you have any questions regarding these comments, please contact Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-2562.

Dennis J. O'Bryant

Dennis J. O'Bryant
Environmental Program Coordinator

DJO:ZM:dlw
0313q/0008q

cc: Zoe McCrea, Division of Mines and Geology
Gary Taylor, Division of Mines and Geology

State of California
The Resources Agency

53

Memorandum

To : The Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Attention Gordon F. Snow, Ph.D.
Projects Coordinator

Date : October 5, 1988

From : **Department of Fish and Game**

Subject : Draft EIS: The Monuments-Boundary Adjustments: Death Valley and Joshua Tree National Monuments, U.S. Bureau of Land Management (BLM), Inyo, Riverside & San Bernardino Counties - SCH 88060303

The Department of Fish and Game (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for The Monuments, a proposal to expand the boundaries of Death Valley and Joshua Tree National Monuments. The proposed project consists of the transfer of five parcels, totalling 210,970 acres, currently managed by the BLM, to the National Park Service (NPS), to be managed within Death Valley and Joshua Tree National Monuments. Our comments on the DEIS are the following:

We concur with the proposed transfer of lands to the Death Valley National Monument because it would better protect the integrity of the aquatic ecosystems. We believe that the benefits to wildlife populations which will be realized as a result of phasing out of grazing on the north Death Valley parcel and the Hunter Mountain parcel will be substantial. As documented in the DEIS, grazing for domestic livestock can limit wildlife populations through direct competition for forage and water and spread of disease. Restrictions on mining activities proposed by the NPS will also have benefits to wildlife by limiting disturbance and access. Protection of the endangered plant species Sodaville milk vetch, Astragalus lentiginosus var. sesquimetralis, in the Big Sand Spring area will also be facilitated by management strategies of the NPS.

However, we are concerned with statements made in the DEIS that bighorn sheep populations in the Last Chance Range, Hunter Mountain, Pyramid Peak and Black Mountain, Eagle Mountain, and many other ranges will decline. Page 3-37 of the DEIS discusses the downward trend in bighorn sheep populations in Death Valley National Monument that has been occurring for the last 27 years. We believe this trend can be reversed if proactive management efforts, such as guzzler construction and maintenance, are undertaken. It is our opinion that habitat for bighorn sheep and other wildlife species has already been so severely altered by mining, grazing and public access that direct habitat enhancement and habitat management efforts must be undertaken to counteract these adverse habitat effects of past facility management decisions. Our June 22, 1988 letter on the Notice of Intent for 53-1

this project discussed our concerns in detail. The NPS direction
to manage habitats and wildlife populations in their "natural"
state is admirable. However, negative impacts to natural wildlife
habitats within Monument boundaries continue to occur due to
53-2 construction and paving of roads and construction of campgrounds
and related improvements.

The Department cannot support any alternative which would result in further decline of wild sheep populations. In this regard, the DEIS states ". . . the NPS may identify certain natural water sources as critical watering sites needed to maintain a viable bighorn sheep population and, therefore, allow a minimal degree of modification to maintain water for bighorn . . . ." This indicates to us that greater flexibility in managing for wildlife populations within the Monument is possible to offset a particular adverse impact to wildlife. We would support the proposed alternative provided that guzzler construction and maintenance are included among allowable modifications. We will be glad to work with NPS personnel to develop management plans for wildlife within the Monument to restore the damage that has occurred in the past from various activities such as mining, grazing, etc., especially those that have been authorized or permitted subsequent to establishment of either Monument.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Fred Worthley, Regional Manager of Region 5, at 330 Golden Shore, Suite 50, Long Beach, CA 90802 or by telephone at (213) 590-5113.

Pete Bontadelli
Pete Bontadelli
Director

__Response__

53-1 Please see second mitigation in Mitigation Measure, Chapter 4. According to NPS Management Policies (1981), "the Service will perpetuate the native animal life of the parks for their essential role in the natural ecosystems." Furthermore, "natural processes shall be relied upon to regulate populations of native species to the greatest extent possible." The NPS is thus reluctant to support Monument bighorn populations by artificial means (guzzlers), unless it has been documented that natural water sources in bighorn range have been usurped by human activities. The NPS retains the management option of water development, should research reveal evidence of past or present human impacts on water sources.

The NPS is thus reluctant to support Monument bighorn populations by artificial means (guzzlers), unless it has been documented that natural water sources in bighorn range have been usurped by human activities. The NPS retains the management option of water development, should research reveal evidence of part or present human impacts on water sources. Specifically, the Monument has contracted with a professional hydrologist for an examination and evaluation of potentially impacted spring sites in the Black Mountains. Pending the outcome of the investigations, the NPS is prepared to initiate water enhancement at impacted spring sites in that range.

53-2 There is presently no "construction or paving of roads and construction of campgrounds and related improvements" going on within monument boundaries. Future construction is covered in the monument's general management plan which states:
"The general management plan is a conceptual document that sets overall management is a conceptual document that sets overall management philosophy and direction for the monument. No major project would be implemented without an environmental analysis and potential effects on bighorn sheep as well as other natural resources would be carefully studied. If there was a chance that bighorn or any other sensitive species would be adversely affected, development projects or use would be moved to less sensitive locations, or in some cases the project would be abandoned." Additionally the NPS has contracted to evaluate NPS bighorn sheep management practices within the monument. These precautions should enable the NPS to avoid negative impacts to natural wildlife as much as possible. The NPS appreciates your admiration of this direction to manage habitats and wildlife populations in their natural state.

State of California

The Resources Agency

53A

Memorandum

To : The Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Date : March 9, 1989

From : **Department of Fish and Game**

Subject : Draft EIS: The Monuments-Boundary Adjustments - Death Valley and Joshua Tree National Monuments, U.S. Bureau of Land Management (BLM), Inyo, Riverside & San Bernardino Counties - SCH 88060303

We have reviewed the January 6, 1989 Memorandum for the Record describing the actions and adjustments made by the field managers for the California State Director of the BLM and the Regional Director, Western Region, National Park Service regarding boundary adjustments surrounding Death Valley National Monument and Joshua Tree National Monument.

It is our understanding that the Hunter Mountain area is now excluded from the proposal. We find that this and other actions which have decreased the acreage affected by the proposal have resolved our earlier concerns. For these reasons we would not object to the certification of the DEIS, and we believe that the proposal, as modified, would not result in significant adverse impacts to fish and wildlife resources.

COPY
Original Signed By:
P. T. Jensen
FOR
Pete Bontadelli
Director

cc: Ed Hastey, BLM, Sacramento ✓
Gerald Hillier, BLM, Riverside

10/6/1988

California Desert District.
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 11 PM 12:50
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Dear People:

I have a few general comments on the EIS about the proposed land transfer to the National Park Units at Death Valley and Joshua Tree.

① Your proposals for the transfers in themselves are laudable, but they are FAR TOO LITTLE. The newly protected areas would represent but tiny portions of priceless natural desert resources.

② The EIS itself is inadequate; BLM sets ground rules based on ecological and sound management bases, and then ignores them when the land identification occurs.

54-1 ③ The proposed boundaries are arbitrary and poorly conceived. You chose parcels for management reasons, but there are

54-1 numerous areas - in fact, far greater than the proposed transfers - which ought to transferred because of their excellent, NATIONAL Park-quality resources. Saline and Eureka Valleys, and the Owlshead and Greenwater Mountains should be added, AS A BARE MINIMUM.

④ Let's face it, seven months including 90 days for public review is a pathetically inadequate time to effectively assess such a major land issue in an EIS. I write EIS's for a living, and we spend more time than that on a local shopping center, much less thousands of acres. Let's back up a few steps, and start again. Do it right. The current slapdash treatment is insufficient. "Haste makes waste" has been proven hundreds of times in our environment, and you have the opportunity to discontinue this shortsighted approach. Thank you for allowing comments.

BRUCE JENSEN
1399 PACIFIC AVENUE, #105
SAN LEANDRO, CA 94577

Response

54-1 Please see responses to 46-1 and 49-1.

55

10-7-88

Dear Sirs:

With respect to the DEIS for the East Mojave National Scenic Area:
the proposed transfer of BLM land to NPS is good in principle
but the acreage proposed is much too small. The proposed
boundaries are arbitrary and omit vast areas which by their
55-1 scenic, historic, scientific, archaeological and recreational values
are prime candidates for transfer to NPS; Saline and Eureka Valleys
and the Owlshead and Greenwater mountains for example.

Generally, the draft EIS is inadequate and riddled with inconsistencies, showing the haste with which it was created. We ask that you withdraw it, start over and take the time necessary to create an adequate EIS.

Sincerely

Tom Hedges

2154 Ward street, Berkeley, California 94705

Response

55-1 Please see response to 46-1.

Oct. 9, 1988

Dear Sirs:

I am in favor of transferring of BLM land to Death Valley and Joshua Tree National Monuments, but would like more land of obvious scenic, archaeological, historical, scientific and recreational value included in the designation — such as the Saline and Eureka Valleys as well as Owlshead and Greenwater Mountains. It seems that more thought and planning is needed about the boundaries. I am still supporting the much more comprehensive and worthwhile California Desert Protection Bill. The draft EIS seems like an effort to divert support, particularly administrative, from that bill.

Sincerely,

Sherri Rodgers

57

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 11 PM 1:26
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

9248 Madison Street
Albany CA 94706
Phone: (415) 527-8554; 451-6632

October 6, 1988

Monuments EIS
California Deserts District
BUREAU OF LAND MANAGEMENT
1695 Spruce Street
Riverside, CA 92507

Dear Mesdames/Sirs,

Regarding your Draft EIS for the transfer of land from the BUREAU of LAND MANAGEMENT to the National Park Service:

First, as my organization does, I support your transfers to Death Valley and Joshua Tree as excellent starts of what is needed. Hoewever, as YODELER article points out, they by themselves are totally inadequate to the needs of the desert environment.

According to YODELER, your EIS is loaded with inconsistencies which prove the BUREAU OF LAND MANAGEMENT's inadequacy in managing this environment. Further, the document apparently 57-1 disregards the BUREAU OF LAND MANAGEMENT's own ground rules and ignores its own avowed ecological and management bases for the proposed transfers.

The YODELER tells me that the EIS is totally arbitrary in its proposal of boundaries. The Sierra Club solution is to ADD to the Death Valley and Joshua Tree donations "not only those units which are sound for management reasons but those which belong in the National Park System because they are of National Park quality for scenic, archaeological, historical, scientific and recreation reasons as well." This would include: the Saline and Eureka Valleys, and Owlshead and Greenwater Mountains.

Due to the hurried, inadequate nature of this EIS, I urge that the BUREAU OF LAND MANAGEMENT now withdraw it and prepare instead a thorough and complete EIS for all desirable transfers.

(My information on this EIS derives from an article in the October 1988 SIERRA CLUB YODELER, a "Desert Digest.")

Sincerely,

Hodee Edwards

(Ms) H. W. Edwards
Sierra Club Member

cc: YODELER

Response

57-1 Please see response to 49-1.

DEPARTMENT OF DEFENSE
UNITED STATES OF AMERICA

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

October 3, 1988

REPLY TO
ATTENTION OF:
Office of the Chief
Environmental Resources Branch

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 12 PM 1:05
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District
Bureau of Land Management
ATTN: Mounments EIS
1695 Spruce Street
Riverside, California 92507

Ladies and Gentlemen:

We have reviewed the Draft Enviornmental Impact Statement (DEIS) for the additions to the Death Valley and Joshua Tree National Mounuments in California, as requested in a letter from your office, dated July 1988.

Work in waters of the United States might require a permit under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. We cannot determine from the submitted information the extent of the Corps' jurisdiction over this project. Please give our Regulatory Branch documentation that clearly describes the area and extent of any proposed work in watercourses and adjacent wetlands to help us make that determination.

If the proposed project involves any Federal assistance through funding or permits, compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f) and implementing regulations, 36 CFR 800, will be required.

The proposed plan does not conflict with navigation, flood control, or existing or authorized plans or programs of the Corps of Engineers. We have no comments on the DEIS.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Ruth [illegible] Villalobos

for Robert S. Joe
Chief, Planning Division

59

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 12 PM 12: 58
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 4, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

ATTN: Monuments EIS

Dear Director:

I am writing to express my support of the Bureau's proposed transfers to Death Valley and Joshua Tree as far as they go but to point out that they are only a beginning of what needs to be done to protect valuable and irreplaceable desert resources. Inconsistencies in the EIS verify the Bureau's inability to adequately protect our desert resources, and the Bureau seems to disregard its own ground rules and ignore its own avowed ecological and management bases for the proposed transfers. The arbitrary nature of the boundaries follows no real logic and fails to include valuable resources.

59-1 I urge you to add to Joshua Tree and Death Valley not only those units which are sound for management reasons but those which belong in the National Park System because they are of National Park quality for scenic, archaeological, historical, scientific and recreation reasons. At a minimum, that would include the Saline and Eureka Valleys and Owlshead and Greenwater Mountains. Senator Alan Cranston's California Desert Protection Act is much nearer the mark, transferring nearly 250,000 acres to Joshua Tree along and adding about 1.3 million acres to Death Valley, in addition to creating a new Mojave National Park.

Also, due to the hurried nature of the EIS, I suggest that the Bureau withdraw it in order to prepare, in its place, a thorough and complete EIS for all desirable transfers.

Thank you for the time and consideration which you have given my letter and recommendations.

Sincerely,

Andrea Bowman

Response

59-1 Please see response to 49-1.

60

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

PATRICE DAVISON
FIELD REPRESENTATIVE
P.O. Box 2151, Riverside, CA 92516
714-684-6509

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 NOV -2 PM 4:41
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 27, 1988

Gerald Hillier
BLM Desert District Manager
1695 Spruce Street
Riverside, Ca. 92507

RE: Draft Environmental Impact Statement
BLM-NPS transfer

Dear District Manager Hillier:

The California Association of Four Wheel Drive Clubs supports the comments submitted by the National Outdoor Coalition in regards the Draft EIS for the National Parklands transfer proposal.

Please contact me if you have any questions.

Thank you.

Patrice Davison

Patrice Davison
Field Representative

61

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 14 PM 2:42
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 12, 1988

Dear Sirs,

I support the recommendations made in the draft EIS to transfer some lands to Death Valley and Joshua Tree National Monuments. The document provided valuable information regarding the transfer of lands. Overall, the transfer of certain lands would enhance and provide more managable boundaries for these units of the National Park Service. Specifically, areas such as wildlife and cultural resources may benifit from the added protection under Park Service administration. In the draft EIS subjects such as energy and mineral resources were explored. With the modification of some boundaries (as proposed) impact to these uses would be minimal. The draft EIS is a well written document examing many issues and conflicts that exist. I support the Bureau's preferred alternative that would transfer lands to Death Valley and Joshua Tree National Monuments.

over)

62

October 10, 1988

RECEIVED
BUREAU OF LAND MANAGEMENT

1988 OCT 13 PM 2:15

CALIF. DESERT DISTRICT
RIVERSIDE, CA.

James D. Colt
815 Arthur Court
Bakersfield, CA 93308

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Sirs:

I would like to address the EIS for the proposed transfer of land from the Bureau of Land Management to the National Park Service. The EIS should reflect some facts that would lead many people to conclude that the North Death Valley parcel should remain under BLM jurisdiction.

62-1 Concerning sensitive wildlife species, the EIS notes in Chapter II, pg. 3-2, that the Desert Bighorn "...occupy most of the Last Chance Range and a majority of the population occurs outside the parcel." It is also stated on the same page that the bighorn are mainly on the western slope of the Last Chance Range, "outside the transfer parcel". Later, in Chapter 4 of the EIS it is is estimated that only 10 animals are normally in the parcel area, out of a possible 100. It appears that the proposed addition to Death Valley would include only a small portion of the Bighorn's range. It would not be feasible to incorporate the western edge of the Last Chance Range and the Eureka Valley, as explained in Chapter II, the section on "Alterations Considered but Rejected from Detailed Consideration". It should be pointed out in the EIS that transferring Parcel #1 would conflict with the purpose stated on page 1-1 of not splitting the jurisdiction of bighorn sheep. The BLM obviously has been successful in its management of the bighorn. Their population has risen to 100 in 1988; representing a steady and sustained increase. It should be stated in the EIS that no improvement would be made in the management of the Bighorn, if the transfer of Parcel #1 is made.

Concerning the management of sensitive plants, the BLM has obviously done an excellent job of protecting the wildlife, including the two ACECs. The BLM established the ACECs, and its implementing its Sensitive Plant Policy. The BLM has built an exclosure around the sensitive plant life at Big Sand Spring and ranger patrols have been increased (pg. 3-3). The best influence that is suggested is that the transfer would procure is "bird diversity and abundance at Sand Spring may decrease", a dubious improvement. The EIS states Parcel #1 would receive more public use. It states on the same page (4-3) that the area would receive "continued road maintenance." These plans seem contrary to the assumption that the wildlife will be better preserved by the national Park Service. The EIS states "...the Bureau of Land Management has adequately protected the UPA and rare plant population within the grazing allotment". The EIS should more strongly represent the negative effects on wild plant species if the national Park Service takes over the responsibility for the

North Death Valley Parcel.

62-2 The present arrangements appear to be successful in burro herd management. The EIS states that almost all the population has been removed, that future drift will probably come in from Nevada (pg. 3-6). The EIS should point out that no improvement in burro herd management in parcel #1 is anticipated if the transfer is made.

The military would continue to fly missions over the parcel. There would be no change in the number, or altitude of the flights. (see pages 4-5). Therefore the EIS should reflect that there would be no advantage to transferring parcel #1, to avoid the flights.

62-3 On the question of management presence, the EIS states that the National Park Service would not be able to devote enough resource personnel to make a difference (pg. 4-5). The national Park Service would be able to field more enforcement personnel, but this would be counteracted by the increased public use (see Pg. 4-3). Public use creates the need for enforcement personnel. The EIS should state that no improvement in management presence would be provided by the transfer of the North Death Valley parcel.

The EIS states that the change from BLM, to NPS management would not be significant, because of the existing low level of public use (pg. 4-5). The EIS also states that "consumptive" uses would be curtailed. But any increase in recreational use of the parcel would have to be considered consumptive, however inadvertent or unintentional the damage. The EIS predicts the transfer would increase public use. The EIS should also reflect that increased public use could be damaging. Certainly the "continual road maintenance" that the NPS promises would have to be considered consumptive.

62-4 North Death Valley represents an area of great mineral reserves. The EIS does a good job of pointing out that the loss of access to these reserves could be dangerous for the country, and economically costly. The EIS could provide at least a thumbnail estimate of the potential loss to the local economy by utilizing the prevailing wages paid miners in present mining operations, and estimating the impact such payrolls might have.

The EIS should stress that the area excluded from the North Death Valley parcel, in the BLM Preferred Alternative would exclude an area that has already been highly graded and developed, and presents great potential for future mining.

The North Death Valley parcel should remain under BLM jurisdiction. At best, there would be no advantage to the change, but the disadvantages are many, such as tying up minerals we will need in the future. The EIS should more closely delineate the risks of making the change.

Thank you for your consideration.

Sincerely,

James D. Colt

Response

62-1 The effects of the proposed action and the "No Action" alternative on bighorn sheep in Parcel 1 are identified on page 4-2 and 4-32 to 4-33, respectively. The proposed action would basically provide for a single agency managing the eastern slope of the Last Chance Range.

62-2 As stated (page 4-1 and 4-4), the goal of eliminating burro use of Parcel 1 is common to both agencies. The last burro removal at Sand Spring by the BLM occurred in approximately 1981, and approximately 12 burros use the springs for water. Burro removal within the parcel would likely occur at a faster rate under National Park Service management because of their policy of including "direct reduction" in the removal program.

62-3 Please see response to 53-2 and 87-17.

62-4 Please see page 4-10, third paragraph.

63

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 13 PM 2:11
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Box 63, LAIR
PSF, CA 94129-6850
4 Oct 88

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Bureau of Land Management;

I am writing to comment on the draft environmental impact statement. The proposed land transfers to Death Valley and Joshua Tree National Monument are a good beginning, but they are nowhere near large enough to protect the desert resources. The boundaries of the proposed areas are not well defined, but they do not appear to include some of the most beautiful areas. I urge you to add to Joshua Tree and Death Valley not only those units which are sound for management reasons, but also those which belong in the National Park System because they are of National Park quality for scenic, archaeological, historical, scientific, and recreational reasons as well. At a minimum you should include the Saline and Eureka Valleys, and Owlshead and Greenwater Mountains. I commend you on your attempts to improve the management of our desert lands but feel that the draft EIS is inadequate. This document should be withdrawn, and in it's place a thorough and complete EIS should be prepared which includes these areas I have mentioned.

Sincerely;

Gayle A. Orner

9 · 1988

64

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 13 PM 2:32
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Dear Mr. Haigh,

I am writing you on behalf of the Roy Hunter family, a ranching family from Olancha, Owens Valley (Inyo County), California.

Their situation fairly typifies the winds of change even now sweeping across our western lands. In 1860 Mr. Hunter was raising mules for sale to the U.S. Cavalry, on what is now known as Hunter Mountain. During the 1870's Hunter mined remote Inyo Mountain gold deposits revealed to him and his family by friendly Indians. Later, Mr. Hunter intervened in Washington to secure traditional lands in the Indian name. The Hunter name went on to serve Inyo County in political office. More recently, Roy Hunter grew up on Hunter Mountain, roping wild horses and burros for resale and travelled the rodeo circuit working with the rough stock contractors. Continuing a family tradition, the Hunter family still herds livestock from Hunter Mountain in the eastern desert to the high Sierra summer meadows. Cattle move from winter to summer pasture, stopping off at the Olancha home ranch during the return.

Now in 1988, after 128 years of continued presence in the Owens Valley area, the Hunter family and an old tradition have been served an abrupt death notice. After repeated assurances by the Bureau of Land Management, the National Park Service has informed the family that Hunter Mountain is included in a compromise known as the Boundary Revision created by the bureaucracy as a compromise to prevent passage of Senator Cranston's Senate Bill 2061. Should the Boundary Revision pass muster, the Hunter Mountain Cattle Company will come to an undeserved end.

64-1 B.L.M. has placed the Hunter Mountain enterprise on the bureaucratic auction block. Unless something is done, the Hunter Mountain Cattle Company will cease to exist, and with it a valuable and still valid American lifestyle will bite the dust; another victim in the war of attrition being waged by those who believe no one should live or work on the public domain. That the public lands exist solely to serve the elitist interests of rarified city folk.

During a prior boundary revision, some years ago, the 1860's era Hunter family homestead cabin was added to the monument. Roy Hunter made a huge effort to have the cabin restored to the family and in the end, lost. However, he still retains the water rights. Seasonal livestock migrations in this case are regulated by the B.L.M. in the desert and the U.S.F.S. in the mountains to oversee and prevent any abuse to the natural environment. Locally, the scenario of losing all self-reliant lifestyle to the encroachment of federal government is a horror story too awesome to contemplate. As it is, the old traditions are dying out and their displaced inheritance left to confusion.

Rumor has it that the Superintendent of the Death Valley Monument is more interested in adding to the northern Death Valley Wash to the Monument than he is Hunter Mountain Area. It has been indicated that the Monument could just as well do without Hunter Mountain.

Many people in the Keeler / Owens Valley Area wish that Hunter Mountain remain within B.L.M. jurisdiction.

Sincerely,

Jim Macey

From: Jim Macey : Personal Comment
POB 131
Keeler, Ca. 93530

Response

64-1 Under the Modified Alternative A, the Hunter Mountain parcel would be retained in the CDCA.

9 - 1988

65

The Inyo County Coalition For Balanced Thought/(Multiple Use) of the Public Domain has recently been formed to allow interested parties the privilege of expressing their concern that our public lands remain available to a broad cross-section of societal interests. The formation of such coalitions, indicating a general movement, may be interpreted as a reaction to the threatened takeover of the Public Domain by an aggressive singular use concept.

Already on the Congressional horizon, Senate Bill No. S 2061 announces the end of the congressionally mandated traditional multiple use concept as administered by the Bureau of Land Management. The present Public Domain, with us since the inception of the country, would be placed under the jurisdiction of the National Park Service, and subject to their zealous dedication toward an aggressive singular use.

The National Park Service would take over control of the Public Domain and initiate steps to eradicate multiple use as a working concept. Ignoring the Congressional mandate of the 1976 FLPMA (Federal Land Policy Management ACt) directing the B.L.M., at great expense, to set aside, study and compile data on the public lands under their jurisdiction, Senate Bill No. S 2061 would remove the lands under study and place them within a wilderness, national park designation. The notion that our lands cease to be wild or wilderness unless cloistered within the National Park Service seems to be part of a general hysteria assuming a covetous attitude toward the public's land. In their zeal to lock up the land, certain organizations, both public and private, and for their own reasons, ignore a large segment of our population, not to mention the socio-economic needs of our society.

It is our position that public lands are threatened by a fanatical, overzealous reaction to an imagined history of abuse. With the passage of FLPMA in 1976 and other legislation related to the Country's Public Domain, Congress provided for an adequate regulatory system of checks and balances to more fully protect our public lands. If, for some reason, a loophole exists in the regulations that could result in an area being threatened, it should be a simple matter for Congress to expedite the needed regulation. For example, in order to preserve an area that is already wild, it may only be necessary to designate the region as a "roadless area" rather than implement a major change in designation at the taxpayers' expense. With their tendency toward the development or "improvement" of Public Domain and their control of people while on public lands, the singular usage envisioned by the National Park Service may not necessarily add to the wildness or wilderness of our land or our people. It may be a time of transition in our thinking toward the environment.

An Argument Against The Addition of Hunter Mountain To The Death Valley National Monument 66

Senate Bill No. S 2061, with its National Park Service proposal to acquire nearly 90% of the California desert public lands, may be a remnant of the past. As generations of aware and responsible Americans issue forth across the land, government could be seen more as a caretaker and less dictatorial by remaining a safe distance from the "wildness" of our land and the "independence" of our society. It may fairly be said that a balanced concept of multiple use of public lands has not been fully explored. The Inyo County Coalition for Balanced Thought/(Multiple Use) would like to suggest that a proper land use concept may be found within the phrase "degree of designation".

The American Public has a right not to be herded about as though they were domestics beholden to a landlord government. The American public has a right to an unfettered sense of new, fresh and vital self-reliant discovery as they traverse the Public Domain. A right to a fire under the stars, a sunrise of their own choosing over the sage.

Through education and confidence in the individual it is possible for the public to learn the nuances of leaving the land as they found it -- untouched. With this reaffirmation of ancient tradition, it is likely, in time, that the public will become custodians of their own public domain. Consider the National Park Service as an obsolete system. Conceived prior to the wheel (the automotive industry) it is a system today ill prepared to attract people and, in the same breath, to preserve wilderness. Wilderness in view of the National Park Service is a commodity that demands repackaging for sale to the consumer.

Witness our wild and primitive lands being developed into museums complete with the attendant Support Systems: roads, paved roads, visitor centers, interpretive centers, designated, patrolled, fee campgrounds, redundant and needless signs that serve as a blight on an unblemished landscape, pistols, cops, armed rangers on patrol, parking lots, entry, exit gates and excessive bureaucratic over-management.

May it be suggested that quality of experience constitutes a criteria in the creation of any future environmental impact statement when the publics' right of access to its own land is under review. That quality of experience be an important and new concept/category when considering wilderness legislation. Now is the time to change direction in wilderness thinking, a time to revise the prior custodial relationship.
Thank you.

Jim Macey : Coordinator
POB 131
Keeler, Ca. 93530

An Argument Against the addition of Hunter Mountain to the Death Valley National Monument.

66

9·1988

"In wildness lies the preservation of the earth". The Sierra Club uses this phrase while it attempts to save the earth and its wildness. At the same time, the Sierra Club is inundating our wild lands with legislation. These laws would again create bureaucratic powers to rule us. This is wildness?

The Park Service, in the name of the public good, aided by conservationist legislation, has prevailed upon the federal government to enact legislation giving them broad police powers in administering what has been known as the public domain. For the cause sacred of recreation, battle plans have been drawn and even now the federal government is seeking to seduce the public mind to a subservient mentality so they might prevail in their effort to rule yet another sector of our lives and spirit. The resourcefulness and self-reliance on which this country was founded are now considered a threat to our government that was created of and for the people. It is the people who are now subservient, not their public employees. The public domain was and is one last area of American self-relience in unspoken action. The threat to it is more imagined and used by yet another federal bureaucracy to enhance its image and validate its need for funds. The selling of the public domain for recreational use only is a betrayal of its inherent spirit. In order to further the cause of recreation, guides and facilities are required. This implies personnel who regard the public as imbeciles, or more politely, ignorant children. Guides are not needed in this domain nor any government at all, for that matter. The guidance here is unspoken and a person is on his own. The silence only rules and each man, woman and child finds that his birthright is to explore and each explores for the first time as if no other went before him. This feeling of discovery and the spontaneous unfolding of life is what should be protected by the federal government. Instead, the government seems more interested in its own bureaucratic survival. What is the American citizen? A sheep to be fleeced, a mind to be entered? It is the citizen and his wildness, his self reliance that must be protected. It is the same wildness that lies within the heart of nature, that lies within the heart of man. She passed it from herself and God to the consciousness of man, and it is here that she seeks her final comfort. It is the hope of all concerned that mankind will resolve its insecurities and find a true home on this land. Would this land be free, it must remain wild.

It is my opinion that the Sierra Club and its allies, in their attempt to save the wild lands, will insted destroy that very fragile wildness; for their concept of wildness is neither wild nor free, but rather a tame and domestic notion.

There is real need for open, unregulated space. It is here that one human may meet another. It is there when people who have reached rope's end may really need its soothing silence and lack of spoken demand. Open space is society's escape valve. Close it off and a spirit alive and rebellious will unleash its final frustration. We are at a turning point. Would you impose a police state, a bureaucratic state of mind upon us, or would you still, however imperfectly, strive to resolve our differences as one person to another? For this, open, unregulated space and spirit are necessary. The western desert is the last frontier of unregulated activity. The federal government controls huge tracts of land in the name of the National Forest Service and National Park Service. These are no more than urban parks and as such reflect urban sprawl. It is necessary that humankind enjoy the vital and life nourishing aura of nature's spirit. If you by regulations and control cast aside a knowing natural consciousness, you will have effectively ruined the very wildness that is trying to be saved. A seeming paradox? Not really, for it's true that "in wildness lies the preservation of the world". Let's not be seduced by bureaucratic double-talk. In wildness implies a responsibility. A responsibility of each individual and organization to recognize and preserve the free spirit in each other. Part of life's chore is to embody the open spirit. Let's perserve the right to listen.

Thank you.

JIM MACEY AND BUD MONROE
Bx 213
Keeler, CA 93530

67

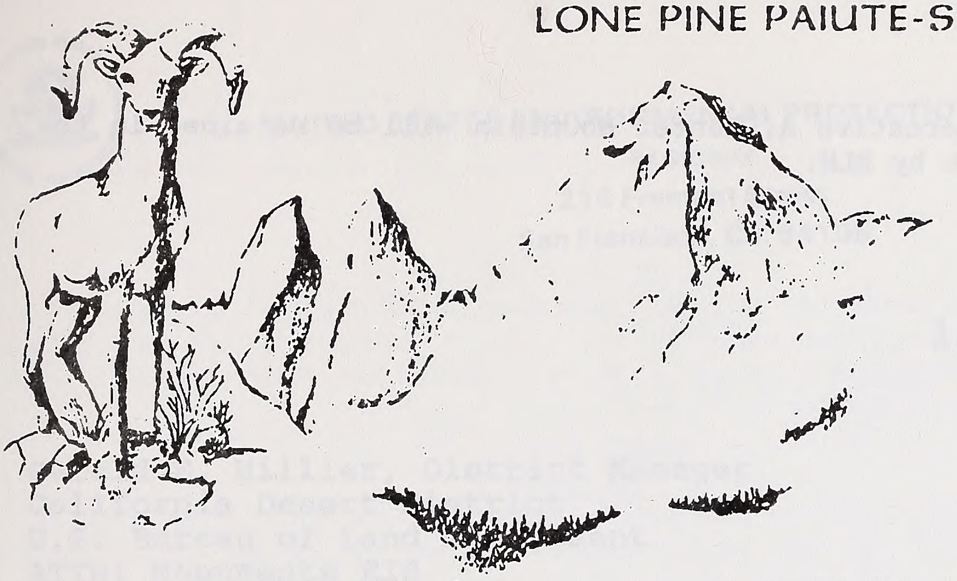
Thurs. 4 Aug 88: Dear BLM: Thanks forthe flow of update bulletins re the plans for the desert areas of So. Calif.

(1) I'm against Cranston's bill as it will lock me out - and hundreds or more of seniors who cannot backpack into the back country of the deserts. And there are YOUNGER ones too who would not hike into or across the desert. This "save it for our grandchildren"is hogwash! After 45 yrs of desert camping (sleeping on the ground, a tent, now-- a small camper on a 4-whl dr trk) and hiking from the trk, I've only once met a true hiker: Collin Fletcher of Wales gathering material for his 1st book on his walk from Mex. to Oregon. We met him on the downhill into Saline Valley yrs ago! And he had to cache water in advance. A Calif Desert Trails assocn caches water VIA WHEELED VEHICLES 1st, THEN they hike, picking up their cycle and ride back. Much, 90% of more of desert country is ALREADY "wilderness because of inaccessibility by road, trail,tracks.So LEAVE PRESENT costly plan alone.

(2) I oppose the proposed addition "south of Pinto Basin" to Joshua Natl Mon (change name if you wish to Park) as it appears (from Riverside County map here)to include EAGLE
68 MT area - all of it to the MWD canal,including our favorit Dragon and Big Wash areas. WHAT WILL BE LEFT FOR US?(

68

LONE PINE PAIUTE-SHOSHONE RESERVATION
1101 SOUTH MAIN STREET
LONE PINE, CALIFORNIA 93545
(619) 876-5414



June 14, 1988

TO WHOM IT MAY CONCERN:

We of the Lone Pine Indian Reservation do ADAMANTLY OPPOSE the creation of another park at Hunter Mountain.

A variety of seeds, plants and pinion, grow in that area that is vital to our well-being, also there are known burials of our people all located on and near Hunter Mountain.

68-1 We feel that if a park is established, it will close off pinion harvesting activities to the Native Americans of Owens Valley.

Sincerely,

Neddeen Naylor

Neddeen Naylor
Tribal Chairperson

Response

68-1 Under Modified Alternative A, Hunter Mountain will be retained in the CDCA for management by BLM.

69

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 20 PM 2: 29
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

14 OCT 1988

Gerald E. Hillier, District Manager
California Desert District
U.S. Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, California 92507

Dear Mr. Hillier:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **MONUMENTS BOUNDARY ADJUSTMENTS, DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS, CALIFORNIA.**

Under the National Environmental Policy Act and Section 309 of the Clean Air Act, the EPA is required to review and comment on this DEIS. We have classified this DEIS as *Category LO, Lack of Objections* (see the enclosed "Summary of Rating Definitions and Follow-Up Actions").

We appreciate the opportunity to review this DEIS. Please send us two copies of the Final Environmental Impact Statement at the same time it is officially filed with the EPA's Washington, D.C. office. If you have any questions, please call me at 415-974-8083 or have your staff contact Mr. David R. Tomsovic at 415-974-8177.

Sincerely,

Deanna M. Wieman, Director
Office of External Affairs

Enclosure (1 page)

cc: Ed Hastey, BLM State Director, Sacramento

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ACTION BY: RETURN TO:		

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

70

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 18 PM 1:30
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Oct. 15, 1988
P.O. Box 1
Shoshone, Calif

Dear Sir,

I disaprove of the Death Valley National monument and Joshua Tree National monument enlarging their boundries because the monuments say, in their draft, that they will maintain the guzzlers, but should they be distroyed by a castastrophic event they would not be replaced. This means that when the guzzlers are gone so are the sheep who water there. They will lie down beside the dry water source and die.

The reason for the guzzlers is because the sheep need the water. So many springs are dry, because of lack of care
70 Indians and prospectors used

71

THE
SAGEBRUSH
PRESS
Post Office Box 87 / Morongo Valley, California 92256

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 18 PM 1:35
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 17, 1988

Bureau of Land Management
California Desert District Office
1695 Spruce Street
Riverside, California 92507-2497

Subject: Proposed transfer of Four Parcels of desert areas in Death Valley to the Death Valley National Monument

To Whom It May Concern:

As a frequent visitor to Death Valley I must lodge my opposition to the Death Valley National monument's bid to secure additional desert land areas now under the jurisdiction of the BLM on the basis that said areas would become "Wilderness Areas" and be closed to motorized transportation. The areas in point are described as: North Death Valley; Hunter Mountain; Pyramid Peak; and Greenwater Valley.

All four areas could be discussed in detail—on the grounds of opposition—but for brevity just one will be cited, and that is the Greenwater Valley area. From "A summary of the NPS's rationale for transfer" we quote in part, ". . . the transfer would also bring the historic Greenwater Mining District within the Monument, thereby enhancing Death Valley's role in representing over a century of mining history of the North Mojave Desert." An examination of the Monument's "policy" will show that mining history and human effort of earlier time plays a very small degree in Monument visitor interest as attested by these subjects being given little coverage in displays and printed description. The emphasis is predominently on "wild life" of bighorn sheep and natural settings of view areas. It is feared the Greenwater mining area will in due time be closed to public travel, should it become part of the Death Valley National Monument.

Much wonderment is expressed in that long-established roads in the Monument are being down-graded or abandoned while these additional areas are being sought by the DVNM. Management in the Monument declares budget does not allow the upkeep of the Beatty cut-off road (from Calif. Hwy. 190 to Boundary Canyon) and plans to close this road when it is next obliterated by storm acitivity. How can the DVNM allow long-time roadways to fall to "no-use" while acquiring additional areas in the interest of the public?

Letters to the Superintendent of the DVNM, regarding the above issues, go unanswered. Personal request to the Superintendent to discuss why the Monument plans to close certain lands and acquire others for Wilderness use are denied, as "policy" does not allow Park Officials to discuss political matters. An editorial written by this party (signed below) and placed in the Death Valley '49ers Newsletter (Fall '88) and covering the matter herein, was—for the first time in '49er history—denied circulation, even though an estimated 95% of the people in that organization do not want to see the Monument's "back country" closed to visitor use. The circulation denial of the article noted may well have political overtones in the background, pressure that does not want to see said issue opened to the public's attention. See the column "Ramblings" on pages 2 and 4 of the enclosed News.

continued ---

Bureau of Land Management
subject: opposition of transfer of land in Death Valley

page 2 ---

The late Matt Ryan, for years Chief Ranger in Death Valley National Monument, was one of the "old school" of desert wisdom. He believed in the great Death Valley being used (not abused) by those who love the desert. When actively employed in DVNM, this man whom many called "Mr. Death Valley", covered much of the Monument on foot and by vehicle. He often, in his later years, expressed dismay over how current management of the Monument seems set on restricting use of Death Valley to simple designated areas, many roadside points and other places close in near headquarters. Mr. Ryan often stressed current personnel in DVNM, for the most part, does not care for the "real Death Valley" and looks upon it all simply as a job while awaiting transfer to a high post elsewhere. I do not "enjoy" addressing management of Death Valley as it is seen here, but it is obvious something "sinister" is underfoot—in the control of Death Valley's back-country—and it is not "for the good of the public".

It is felt by the writer, and others who do not get around to preparing letters, that the BLM is presently managing the areas noted for possible transfer in a sufficient manner, and it is urged the current policy continues as it now stands, or adopt "Alternative E: no action". It will be interesting to see if the voice of one in the public sector, one who loves the desert and wants to continue visiting it for historic study, will merit a favorable response by those who hold the future of Death Valley in the balance.

I would welcome a letter, regarding the decision of the proposed transfer, and what the Bureau of Land Management ultimately decides. Thank you for your time and consideration.

Sincerely,

Daniel Cronkhite

Daniel Cronkhite

encl: Death Valley News, Fall '88

72

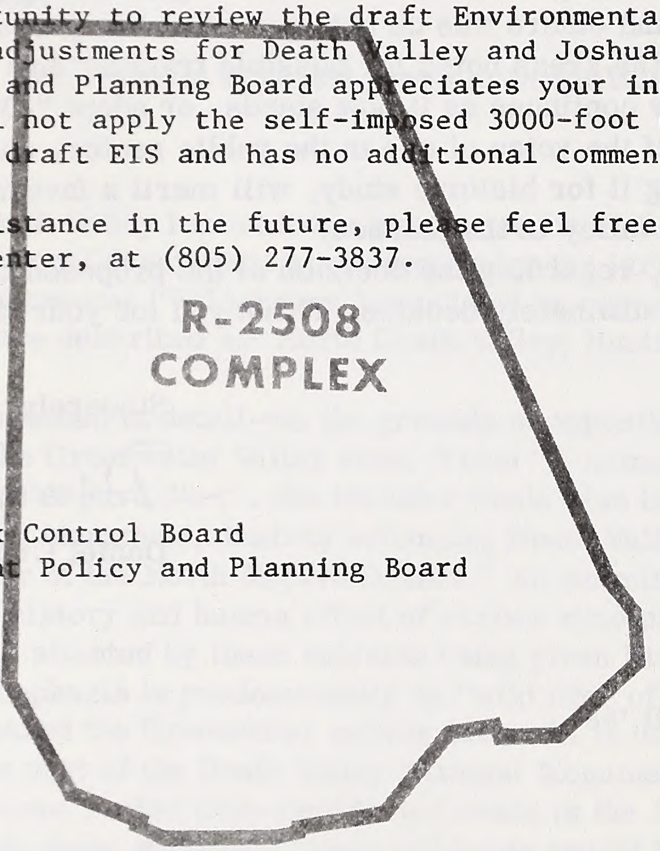
R-2508 JOINT POLICY AND PLANNING BOARD
CENTR[illegible]G FACILITY
EDWARDS [illegible] 93523-5000

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 19 PM 2:36
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

17 Oct 88

California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Sir/Madam:



Thank you for the opportunity to review the draft Environmental Impact Statement (EIS) assessing the boundary adjustments for Death Valley and Joshua Tree National Monuments The R-2508 Joint Policy and Planning Board appreciates your inclusion of our initial concerns (e.g., DoD will not apply the self-imposed 3000-foot overflight limit to the expansion areas) in the draft EIS and has no additional comments on the proposal.

If we can be of any assistance in the future, please feel free to contact Wendy Waiwood, Air Force Flight Test Center, at (805) 277-3837.

Sincerely,

E. C. LENTZ, JR.
Commander, U.S. Navy
Chairman, R-2508 Complex Control Board
By direction of the Joint Policy and Planning Board

73

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 19 PM 2:45
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Douglas A. Shearer
3611 East Hacienda Avenue
Las Vegas, NV 89120

October 18, 1988

Dear B.L.M.:

I am writing to express my opposition to the transfer of B.L.M. lands to Death Valley National Monument.

Let me first introduce myself, I am a Life Member of the Death Valley 49ers, Life Member of the Death Valley Natural History Association, President - Death Valley Hikers (past eight years). I have led the Death Valley 49er Encampment overnight back packing trip in conjunction with the Park Service for over eight years. I make no less than 20 trips per year to Death Valley for almost the last 20 years. I have hiked, back packed and jeeped into more remote areas than most Park Rangers have ever done. In all my years out in the back country, I have never seen a patrolling Ranger. This is in no way to condemn the Park Rangers, just stating a fact. A fact that helps to point out that the Rangers have more than they can handle now. How are they going to handle a bigger park? Sure they will hire more help but how much more can a budget that is always being cut absorb?

73-1 I know Death Valley, I know that by adding parcels of land such as Greenwater Valley and Greenwater Canyon, that the existing policies of the Park Service is to close what they can't patrol. In a zealous effort to protect the Wilderness Study Area, the Park Service proposes to close the area to all four wheelers. While this happens, the wheels of bureaucracy turn slowly, in which it could take years before a decision could be reached. In my many years of back country exploring, I have seen very few people in Greenwater Canyon. The times I have seen them they were in Jeeps, never a person on foot. The canyon always seem the same to me, no over usage, no vandalism of the archaeological sites, no trash. It seems to me the policy on this piece of land by the B.L.M. is working just fine. Don't fix what isn't broken. The Park Service wants to change the status of Death Valley from monument to park that change I can live with but let's see what they are going to do to bring park status to an area that needs many improvements on what they already have. (No campgrounds in the whole southern end of Death Valley, why not?) Much is needed to be done to the lands that they now have, let alone taking on more!

Please reconsider this transfer to the Park Service. I don't think they need the additional lands nor are they prepared to properly manage this large piece of prime real estate.

Sincerely,

Douglas A. Shearer

Response

73-1 It is not the policy of the NPS to "close what areas they can't patrol." In fact, one of the actions proposed in the area's 1988 general management plan is to improve access to remote areas. When monument roads (Titus Canyon, for example) are closed, it is usually due to flash floods making them impassable. When such events occur, every effort is made to reopen the road as soon as possible. Since many floods wash out numerous roads, with limited staffing it is not always possible to reopen roads as quickly as most visitors would like.

74

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1988 OCT 19 PM 2 36
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

1106 Harbert Ln.
Modesto, CA 95350
Oct. 15, 1988

California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce St.
Riverside, CA 92507

In re: Monuments EIS

Dear Sir,

I support the proposed transfers set forth in the plan of units to Death Valley and Joshua Tree National Monument. However there is much more land that should be added to those transfers. There are other units such as the Saline Valley, the Eureka Valley, the Owlshead Mountains, and the Greenwater Mountains to begin with, that should be added to those Monuments both for management reasons, and because of scenic, archaeological, historical, scientific, and recreational reasons. These units are of National Park quality.

It appears that you did not have sufficient time to prepare this report in the professional manner of which you are capable. Undoubtably there were pressures that caused that to happen. It appears that the report should be withdrawn, and a new one prepared in the thorough and complete manner that the professionals in the BLM would be proud of doing.

Yours Truly,

Harry P. Drabkin

Harry P. Drabkin

75

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BUREAU OF LAND MANAGEMENT
1988 OCT 20 PM 2:29
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District
BLM - Monuments EIS
1695 Spruce St.
Riverside, CA 92507

Jim Dunne
3864 Valley Lane
El Sobrante, CA 94803

October 14, 1988

Greetings,

It gives me great pleasure to express my opinions concerning the precious desert lands of Southern California. I have hiked, camped, and explored in these desert wildlands for more than 25 years, and the needless ecological destruction I have seen from livestock, off-road vehicles, and other mismanagement and abuse has disgusted me to no end. I feel that my comments on this EIS are very important.

I support the BLM proposal to transfer land to Death Valley and Joshua Tree, but I think that alone these transfers are not enough to protect these beautiful, priceless, and irreplaceable desert resources. More land needs to, and should be transferred to the above Monuments to ensure that my children will have the same opportunities to enjoy our California desert lands that I've had and allow the natural evolution of California desert habitat.

The EIS has inconsistencies that underscore my concerns that the BLM cannot manage these lands properly, and makes me wonder why the BLM cannot find better employees. Throughout the EIS the BLM disregards its own standards and neglects its own stated ecological and management basis for the proposed transfers.

75-1 A major concern I have is the arbitrary boundaries of the land units proposed for transfer. I think that besides the land units being transferred for good management reasons, any, and all, surrounding land that has quality scenic, archaeological, historical, scientific, hydric, and recreation values, including the Saline and Eureka Valleys, and the Owlshead and Greenwater Mountains, should be added to the Monuments.

Because of the unusual quickness of publication and inadequacy of the EIS, the BLM should withdraw it and prepare a thorough, complete one that includes all desireable surrounding land. I believe that there is way more land out there for use by those who feel that they must destroy our deserts for their personal fun and games than they'll ever be able to wreck even if all land proposed by the Cranston Bill is protected. And the revenues brought into the local economies by passive users of these beautiful lands far outweighs any that the livestock industry can contribute. We need to preserve these lands not only for the future enjoyment of all citizens, but for the conservation of native habitat and species diversity. Much of these lands have been altered by livestock and other destructive use, and its time we allow our land to heal and renew itself by adding to the Monuments and establishing wilderness areas.

Sincerely,

Jim Dunne

Jim Dunne

Response

75-1 Please see response to 46-1.

Suzanne E. Taylor
5200 Stonewood Court
F[illegible], California 92635

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BUREAU OF LAND MANAGEMENT
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RIVERSIDE, CA.

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10-14-88

BLM
Calif Desert District
1695 Spruce St
Riverside CA 92507

ATT Monument EIS

I support no action alternative E regarding the monument EIS.

I enjoy prospecting and I really don't want to lose my claims.

Thank you.

Suzanne E Taylor

76

920 **77**

Henry Peck
534 Bookwalter
New Carlisle, Ohio, 45344

October 17, 1988

U. S. Department of the Interior
2800 Cottage Way
Sacramento, California, 95825

Dear Sirs:

Thank you for your July 19 bulletin. In response to it, I resepctfully request the maximum possible size for the Joshua Tree and Death Valley National Monuments of 211,000 acres. Please add North Death Valley, Hunter Mountain, Pyramid Peak, Greenwater Valley, and Pinto Basin.

Thank you for your attention.

Sincerely yours,

Henry Peck

Henry Peck

JOHN R. SWANSON
P. O. Box 6554
Minneapolis, Minn. 55406

October 21, 1988.

Bureau of Land Management
1695 Spruce Street
Riverside, California 92507.

Dear Sirs,

Please accept my Comments concerning the —
The Monuments - Draft Environmental Impact Statement.

I strongly favor the transfer of several parcels of public land; Bureau of Land Management, to the Death Valley and Joshua Tree National Monuments.
as such parcels contain outstanding wilderness wildlife, biological, cultural and scenic, resources of certain National significance.
With these parcels providing a vital refuge for Man, and for all Life.

In addition to my support concerning adding some 248,000 acres of Bureau of Land Management areas to the Death Valley and Joshua Tree National Monuments;
I strongly urge that additional areas be included in such, transfer, as such units contain unique, varied and fragile resources of certain National importance.
With such added areas to include (in part):
• Eagle Mountains, • enlarged Pyramid Peak, • Eureka, Saline and Northern Panamint Valleys, • Owlshead Mountains, • Little San Bernardino Mountains, • Pinto Mountains and, • Coxcomb Mountains.

and to include (at least) **1985**,000 acres of Bureau of Land Management areas to be added to the Death Valley National Monument and Joshua Tree National Monument, at this time.
With this acreage to be dedicated as Wilderness.

also, to guarantee that America will establish the following:

A) a Death Valley National Park of 7,510,000 acres —
with a Wilderness of 7,400,000 acres.

B) a Joshua Tree National Park of 1,805,000 acres —
with a Wilderness of 1,725,000 acres.

Sincerely,

John R. Swanson

78

79

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 21 PM 1:53
CALIF. DESERT DISTRICT
RIVERSIDE, CA

DESERT BIGHORN COUNCIL
Established to promote the advancement of knowledge concerning the Desert Bighorn Sheep and the long-range welfare of these animals.

ROUTING TO:	DATE	INIT.
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OPS		
RES		
MIN		
AMs cc	BRA	RRA
ACTION BY: RETURN TO:		

Sent 10/25

16 October 1988

P.O. Box 1383
Loomis, CA 95650

Mr. Gerald E. Hillier
District Manager
California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier:

The Desert Bighorn Council (DBC) was established in 1957 to promote the advancement of knowledge concerning the desert bighorn and the long-range welfare of these animals. It is comprized of biologists from state and federal agencies and the private sector, all engaged in the management, protection, and scientific study of the bighorn.

The Technical Staff of the DBC has reviewed The Monuments Draft Environmental Impact Statement concerning boundary adjustments for Death Valley and Joshua Tree National Monuments: alternatives A through E, and our comments follow.

Water is a critical element for wildlife in desert habitats. Without it, most species could not survive. The BLM and California Department of Fish and Game (CDFG) have, over the last 30+ years, developed hundreds of artificial waters (guzzlers) for wildlife, starting with smaller species such as quail, and progressing to desert bighorn sheep. Volunteers from the Society for the Conservation of Bighorn Sheep (SCBS), a lay organization, have worked with both the BLM and CDFG in constructing and maintaining many desert bighorn waters. The point here is that artificial water developments are sustaining wildlife populations throughout the southern California deserts. The National Park Service (NPS) policy as described in this DEIS is to maintain existing guzzlers but not to replace those which may be destroyed. The North Death Valley parcel has one new guzzler within its boundaries. This, plus two others nearby, supports one hundred bighorns with potential for more. Under NPS policy if the guzzler was destroyed it

79-1 would not be replaced, and the bighorn depending upon it would be forced elsewhere or lost. The Technical Staff finds this unconscionable, especially in light of the importance of desert bighorns--a sensitive species in California. An agency is not managing wildlife or wildlife habitat if it allows a population of bighorns (or any other wildlife) to perish because it won't replace the water on which they survive.

Concerning development of new waters, based on the collective experience of the Technical Staff throughout the west, Park Service efforts to date have been virtually nil. It appears doubtful, even if opportunities for water development were identified, that NPS would make the developments, including taking advantage of the volunteer labor pool from the SCBS.

Track Record. The desert bighorn population in California is up about 20 per cent in the past ten years, based on reports presented at the past several annual meetings of the DBC. The majority of this population increase has taken place on BLM lands. Considerable potential exists (with the development of additional artificial waters, among other things) to further increase the population. The Park Service, on the other hand, based on data in this DEIS, has a very poor record: bighorn populations have been declining at Death Valley National Monument since the 1960's, and continue to do so (discussion on Pyramid Peak and Greenwater Valley parcels, pp3-37 and 3-44). Estimated bighorn population in 1987 was down 78 per cent in the Funeral Mountains where NPS manages 85 per cent of the land, and down 62 per cent in the Black Mountains, again where NPS manages 85 per cent of the land. Based on this, the Technical Staff sees no way there will be an upward change, save a major change in NPS policy, which is very improbable.

In summary, based on our comments above, the Technical Staff of the Desert Bighorn Council strongly supports DEIS Alternative E, No Action/continuation of the status quo. Active wildlife habitat improvement, including water development would be allowed to continue, as would increases in the desert bighorn population in California. Neither would occur under Alternative A, Park Service management.

We appreciate the opportunity to comment on this DEIS. Please keep the DBC informed of its status. Thank you.

Sincerely,

Richard A. Weaver, Chairman
Technical Staff
Desert Bighorn Council

Response

79-1 See response to comment 53-1

80

United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

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1988 OCT 21 PM 1:53
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 18, 1988

Memorandum

To: Gerald E. Hillier, District Manager--California Desert District, Bureau of Land Management, Riverside, California

From: Supervisor--Mineral Issue Involvement Section, Branch of Engineering and Economic Analysis

Subject: Review of The Monuments Draft Environmental Impact Statement (DEIS) for Boundary Adjustments to the Death Valley and Joshua Tree National Monuments

The Monuments DEIS contains one of the most detailed descriptions of mineral resources and mineral resource potential that we have seen in an EIS. The differences between Bureau of Land Management (BLM) and National Park Service management policies for mineral natural resources and how those policies would affect future mineral development were presented in equal detail. For this we commend the BLM personnel of the California Desert District who prepared this EIS.

We do have some comments and suggestions that we feel would clarify certain portions of the report. Combining energy (leasable) resources with mineral (locatable) resources on a single map called Mineral Resources Potential creates some confusion. The use of the same stippling to denote high or moderate potential for both energy and mineral resources tends to infer a correlation on the map between these two different resources. It also gives the appearance that potential for energy resources may occur in an area where, in fact, there is no known potential. We prefer that these two types of resources be identified on separate potential maps. However, changes in the map explanations could rectify the situation. The explanation, " . . . occurrence of energy and/or non-energy minerals" should be changed to " . . . occurrence of energy and/or mineral resources" (e.g., is geothermal an energy mineral?). On maps where there is no energy resource potential, the explanation should just read " . . . occurrences of mineral resources." The explanation should also be edited for specific resource abbreviations that were or were not used on the map.

The Summary of Impacts table gives a good overview of which resources are an issue for each area, but it tends to de-emphasize how important each resource is compared with the others. For example, are you equally comparing highly negative impacts on significant acreages of high mineral potential to highly positive impacts on minor acreages of critical wildlife habitat or vice versa? A table giving acreages of high or moderate mineral resource potential compared with accessibility, similar to the example sent to you with our July 7, 1988, letter, would show the quantity of quality acreages which will be impacted by the transfer of jurisdiction. Such a table would quickly show which alternative or compromise to the alternatives least impacts those natural resources. This cannot be done from the current table.

Thank you for this opportunity to comment on the DEIS for The Monuments. If there are any questions concerning these comments, please let us know.

D'Arcy P. Banister

D'Arcy P. Banister

81

Dear sirs/ms: 10/22

I support the BLM proposed transfers to Death Valley & Joshua Tree but they are only the beginning. Much more land is needed in the transfers to protect the wildlife and to include most of the major scenic, archaeological, historical & recreation areas. These include Saline & Eureka Valleys and Owlshead & Greenwater Mountains.

The EIS was done too fast & in an inadequate way. Please withdraw it & replace it with a thorough one that includes all reasonable & desirable transfers.

81 Robert Wilkinson

82

53-065 Ave. Navarro
La Quinta, CA 92253
Oct. 24, 1988

California Desert District, BLM
Attn: Monuments EIS
1695 Spruce St.
Riverside, California

Gentlemen:

This is to assure you that we highly approve of your proposal to add 211,000 acres of BLM land to Joshua Tree and Death Valley National Monuments. The parcels you name are known to us, and are, in our opinion, very desirable additions.

The greatly increasing use of these Monuments, both by Californians and others, as well as the desirability of adjusting boundaries to include natural ecosystems, strongly recommend the plan.

Yours aincerely,

Richard M. Keller
Eva S. Keller

83

ROUTING TO:	DATE	INIT.
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PA		
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OPS		
MIN		
AMs		
ACTION BY: RETURN TO:		

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RIVERSIDE, CA.

March 3, 1849

United States Department of the Interior
FISH AND WILDLIFE SERVICE
LAGUNA NIGUEL FIELD OFFICE
24000 Avila Road
Laguna Niguel, California 92656

October 24, 1988

To: District Manager, California Desert District, Riverside, California

From: Field Supervisor

Subject: Draft environmental impact statement for boundary adjustments, Death Valley and Joshua Tree National Monuments (1600 (CA-060.2)) (1-6-89-TA-17)

The Fish and Wildlife Service (Service) has reviewed the referenced draft environmental impact statement which describes plans to transfer 210,970 acres of land currently managed by the Bureau of Land Management (Bureau) to the National Park Service (Park Service). Four parcels of land would be administered by Death Valley National Monument and one parcel by Joshua Tree National Monument. Four alternatives, including the no action alternative, are being considered; these alternatives differ in the amount of land being considered for transfer.

Park Service mandates require the agency to manage lands in a manner that will conserve the wildlife of the administered lands and provide for non-consumptive public enjoyment of this resource. Thus, many activities that can directly or indirectly adversely affect wildlife, such as off-road vehicle use, mining, and hunting, are either completely prohibited within National Monuments or are very strictly regulated. On the other hand, Bureau lands are managed for multiple uses and, as a result, wildlife resources are occasionally adversely affected by permitted activities. For these reasons, the Service supports the proposals for transfer of these lands to the Park Service. Given the additional protection that would be afforded to wildlife by these transfers, the Service encourages the Bureau and the Park Service to fully consider implementation of Alternatives C and D, which would allow the greatest acreage to be transferred.

Although the Service supports the transfer of these lands, we are concerned that some aspects of Park Service management could, over time, result in adverse impacts to wildlife. Specifically, we believe that the Park Service should carefully consider its policy of not repairing guzzlers that are destroyed by natural events. These water sources are important for maintaining bighorn sheep populations in areas that may be becoming more arid as a result of general climatic trends or water use from beyond the Monuments' boundaries. As populations which are protected from both legal and illegal hunting, bighorn managed by the Park

Service may represent populations which stand the best opportunity to function in an manner that most closely reflects population dynamics prior to development of the area. Furthermore, the opportunity to view desert bighorn in a natural setting is certainly one of the chief attractions of these areas; maintenance of suitably placed water sources could serve to promote a wide-ranging sheep population and mitigate for any increased tourist pressure that may result from the expansion of the Monuments' boundaries.

The Service is also concerned that facility development and increased tourism may adversely affect species which are candidates for listing as endangered or threatened which occur within the transfer lands. We recommend that appropriate environmental documentation be prepared for any actions of this nature that are contemplated, and that these documents be sent to the Service for review. Copies of any documents should be sent to the address listed above and also to our Sacramento office which administers endangered species issues in Inyo County. They can be reached at:

Fish and Wildlife Service
Office of Endangered Species
2800 Cottage Way, Room E-1823
Sacramento, California 95825

Management of candidate species in a manner that ensures their future survival can preclude the need to list these species as endangered in the future.

Finally, maintenance of springs with at least some open water can provide great benefits to wildlife. Because these water sources currently exist in this manner, allowing them to fill in, even naturally, could result in adverse impacts to wildlife. This management procedure should be carefully reviewed and discussed with other wildlife resource personnel should the transfers be enacted.

The Service appreciates the opportunity to participate in your planning process. We believe that the proposed action could have substantial positive effects on wildlife. If you have any questions, please contact Ray Bransfield of my staff at (714) 643-4270.

Peter A. Stine
for Nancy M. Kaufman

cc: USFWS, Endangered Species, Sacramento, CA (Attn: J. Bartel or T. Rado)
CDFG, Region 5, Long Beach, CA
CDFG, Bishop, CA

84

Oct. 18, 1988

Gerald E. Hillier
District Manager

I am writing to urge you to combine and adopt Alternatives C and D of the DEIS for the Monuments Boundary Adjustments. Both of these additions should not be left out of your preferred alternative as they add significant areas of wilderness to the two monuments.

The Eagle Mountains are essential to the maintenance of the Pinto Basin ecosystem, as the elevational changes add habitat for species diversity, many of which use the transition zone between between the basin and mountain systems as hunting habitat. This addition would also protect the Pinto Basin from adverse impacts due to more intensive uses of the Eagle Mountains.

The Modified Pyramid Peak proposal appears to be a valid addition for the administration of the Funeral Mountains along with eliminating an already impacted area of mineral extraction. Because this area is located along the lower edges of a bajada, its continued use will have little, if any, effect on the Pyramid Peak area.

Again, I urge you to adopt the combination of Alternatives C and D of the DEIS for the Monuments Boundary Adjustment. Thank you for your time.

Sincerely,

Christopher S. Haynes
Christopher S. Haynes

1726 Buttermilk Lane
Arcata, CA 95521

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85

The San Diego Mineral & Gem Society, Inc.

Spanish Village
Balboa Park
San Diego, California 92101

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October 21, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, Ca. 92507

Attn: Monuments EIS

Gentlemen:

I can appreciate the request of the Park authorities to acquire land in order to straighten boundaries so the land may become more manageable.

However, I cannot see sealing off the possibility for mineral extraction in this time of our country's history on any parcels which have a potential for future resource needs. This can become a dangerous precedent unless the laws are changed to permit mining (future) in park lands. I cannot foresee this happening in the immediate future.

We do not need more park lands - areas such as these will be protected and controlled just as well under BLM management regulations as would be necessary under limited Park funding.

Far better to work out a cooperative process between the two agencies to accomplish the intent of the Park system, and yet under the BLM retain the ability to extract minerals should the future so dictate.

I urge careful consideration for maximum benefit to the people of the United States.

Sincerely,

Carmelita Swarts

Carmelita Swarts
Public Lands Liason

86

Inyo-Mono County
Farm Bureau

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RIVERSIDE, CA.

Monuments EIS

Dear Sir,

The Inyo-Mono County Farm Bureau and the Inyo-Mono County Cattleman's Association support the multiple use concept for our public lands. We are opposed to changes in policy that limit agriculture.

Included in the Draft Environmental Impact Statement for the boundary adjustments for the Death Valley and Joshua Tree National Monuments is the admission that studies are not complete on viral disease transmission from cattle to bighorn, and the social impact of cattle on deer and bighorn, and cattle impacts on riparian and aquatic habitats. We believe it is not right to transfer five parcels of public lands currently managed by the BLM to the Death Valley and Joshua Tree National Monuments until there is conclusive evidence of damage by cattle. Under BLM policy cattle can co-exist with wildlife. We therefore support Alternative E No Action.

Sincerely, Scott J Kemp
Public Lands Rep.

87

Death Valley Chamber of Commerce
Tecopa — Shoshone — Furnace Creek
#2 Post Office Row
Tecopa, California 92389

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CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District
Bureau of Land Management
ATTN: MONUMENTS EIS
1695 Spruce Street
Riverside, CA. 92507

Dear Sirs:

The Death Valley Chamber of commerce does NOT support the B.L.M.'s preferred alternative in the Monuments Draft Environmental Statement for many reasons (some listed below) and suggests either Alternate "E", Alternative "F" (described herein), or a very minimal extension to the North Death Valley area confined by the topographic floor of the valley itself. The Death Valley Chamber, would like to address the following comments to the Monuments Draft Environmental Statement with some references to page numbers of statements needing comment.

87-1 1. Pages S-2 and S-3 address only five alternatives. All variabilities of land unit change or non- change should be addressed equally. An additional alternative "F" should include studies to move the Monument boundaries toward the center of the Monument; especially in the areas of known important mineral resource such as the borate areas.

87-1A 2. The N.P.S. has stated in their own long range Death Valley Management plan that they wish to concentrate visitation to the central areas of the park and is closing down outlying areas they can't manage. This will do no good for the land, the resources or the people who live in the desert and it indicates that the Park Service will not be able to adequately manage more land with out increased tax costs. Present cuts in the N.P.S. budgets can be expected to continue as federal spending comes under fire. The Co-operative management type of philosophy with good educational support that the B.L.M. is striving to attain with the public will be much more effective environmental management for the future and will cost less as the public becomes more involved.

87-2 3. Some of the findings of the EIS Draft are lacking in reason and study. In the case of mineral review, no B.L.M. Geologist has done field work pertaining to the EIS. Fred Johnson from Tecopa, CA. has offered on behalf of the Death Valley Chamber of Commerce and his own minerals exploration company to discuss and point out mineral occurrences and potentials in the field with a B.L.M. geologist, but has been informed that B.L.M. area geologists have no time to do these field studies. People who have worked with minerals and mineral economics for 10 to 20 years or more in the Greenwater, Funeral, North Death Valley, Hunter Mountain, and Pinto Basin parcels should be sought out and consulted before any EIS is final.

87-3 4. The entire rational and reasoning for transferring any of the Greenwater parcel is flawed. Assignment of a low mineral potential to northern Greenwater is incorrect. Presently two exploration companies are looking at extensive mineral trends for copper, silver, gold and possibly strategic Cobalt resources. Ore grade gold and silver assays are reported from some of the explorations on the 28 mile trend noted by Taylor in 1986 (F. Johnson, 1988). The anomalous mineral zones are well documented in U.S.G.S. reports (noted in the EIS), State SMARA reports (noted in the EIS), and a strong geophysical trend to the north is shown in the suitable southwestern Greenwater W.S.A. study on the mineral potential. This area should be included in discussion on pages 4-40 and 4-41. Where is the B.L.M. geologist who is suppose to look at these trends ?

87-4 5. The B.L.M.'s discussion of negative impacts on minerals development in the entire Greenwater parcel is lacking any reserve or potential reserve studies: and therefore projected estimates of sizes of talc and metallic mineral mining in the future are very speculative, and even at that, are very low speculative estimates.

6. There has been a very extensive boundary survey of Death Valley National Monument's boundaries in the Greenwater area at a large tax cost. The boundary is marked well in areas of accessable use, and arguments for a more definable boundary are ludicrous. The only known complicated boundary area in the Greenwater area is in an area where the National Park Service has not only complicated the land picture, but has negatively impacted the ability to explore a high mineral potential area near the old town of Greenwater by acquiring private (patented) mining claims outside of the National Monument boundary the legality and intent of this past purchase should be investigated in the EIS because it has deterred mineral exploration in this important area that the N.P.S. now wishes to incorporate in their non-use management plans.

87-5 7. The B.L.M. preferred alternative obviously does not give adequate weight to the negative economic impact of the transfer of Hunter Mountain in terms of the Hunter family's ranching and the businesses that support the Hunters, or in terms of the future potential of the Hunter Mountain Wollastonite deposit to benefit the economy of Inyo County.

87-6 8. The N.P.S. reasoning that they will get the entire Black Mountain watershed (pg.2-7) and this will give them better management is obviously incorrect just look at a map. The statement and implication of the N.P.S. that the boundary change will help control surface and subsurface water overflow into Death Valley is vague and would pertain to the entire southern Amargosa Valley as well as Greenwater. Present data on groundwater flows are insufficient because of the lack of study in a very complex system.

87-7 9. Presently the N.P.S. does not even maintain existing springs for wildlife. The statement on pg. 2-7 that the Black Mtn. Bighorn herd would be brought under one management is also false because bighorn herds can migrate across man made boundaries into the Greenwater Range.

87-8 10. The enhancement of wildlife in all of the proposed areas is now and will be dependent on programs set up by the California Division of Fish and Game. These programs which involve hunting, guzzler maintenance, and population maintenance programs would be destroyed by transfer to the N.P.S.

11. The present EIS draft does not address issues raised in letters to the B.L.M. after the scoping meetings. People who wrote in comments for consideration in the EIS received no acknowledgement of their input and some did not even receive an~~d~~ EIS Draft in the mail. Two examples are the Tecopa citizens, Paul Watkins and Ray Anne French.

12. The tone of the EIS Draft public comment period in Tecopa was set when Alden Seivers attended the meeting and failed to adequately inform the public of the nature of needed comments on the Draft EIS. The result was many uniformed comments that did say one thing: The public here wants NO transfer "E" because of potential adverse economic impact on the local community. This type of impact should be studied thouroughly before any transfer proposal is passed on to the President

because with some commodities it may have negative effects that reach other areas of our country. See enclosed paper.

13. On page S-2 ten issues have been considered: however more issues should be considered. One of the most important issues should be the effect of the removal of potential future economy from local communities and counties. This is issue is not adequately addressed or studied in the E.I.S. In much of the area under consideration for transfer to Death Valley National Monument, Wilderness Study Area designations have drastically curtailed exploration of favorable mineral target areas for many years. A transfer of these lands (especially the tens of thousands of acres designated Non-suitable for wilderness) will essentially deny and curtail any further exploration for mineral resource. This action would constitute a change in management before the Congressional decisions which may be vital to the future economic viability of local areas in Inyo County. There will be no more discoveries or opportunities.

87-9 14. This "Boundary Adjustment" land transfer process is beyond the scope of a Plan Amendment because it drops the Desert Plan without allowing recourse for the exploring public. F.L.P.M.A. and the Desert Plan promised a review of all B.L.M. Wilderness Study recommendations by Congress, and subsequent release of these lands to public multiple use (L or M) if they are deemed unsuitable. This "Boundary Adjustment" process jumps the processes mandated by Congress, F.L.P.M.A., and the Plan; and therefore is a breech of contract that is in violation of the wishes of Congress and the people. A No Action alternative "E" would allow present on-going federal, state, and local public multiple land use plans and promised goals to be realized before moving on to some other agency with different plans and goals.

For these and many other reasons the Death Valley Chamber of Commerce VOTES NO on any boundary adjustment proposed in the Monuments EIS.

SINCERELY,

Paul W. Watkins

Paul Watkins
President

Martha C. Watkins

Martha Watkins
Executive Secretary

Frederic C. Johnson

Fred Johnson
President-Elect

Response

87-1 Please see response 2-1

87-1A According to the NPS 1988 General Management Plan, exactly the opposite of this statement is true. That plan states on page 25 (underlining added for emphasis):

> "The draft general management plan would continue to focus visitor attention on the Death Valley floor helping people learn about and enjoy the natural and cultural resources of the valley and also giving them the opportunity to experience the intangible qualities that make Death Valley unique--the quiet and isolation, the depth of colors, and the clear sky. Access would also be improved to various points of interest away from the valley floor so that more visitors could experience these features. In particular, four areas (the Grapevine Mountains, the Racetrack area, Wildrose/Emigrant corridor, and the Ibex Hills and Dunes) would be emphasized as destination points."

87-2 Although it is true that BLM geologists did not do much field work in these areas, we disagree that their assessments are lacking in reason and study. The assessments included a study of available literature and even proprietary reports. They also included conversations with Fred Johnson, a mining consultant in Tecopa.

87-3 We disagree that BLM's assessment of mostly low mineral potential is flawed. The BLM assessment of mostly low potential for the occurrences of mineral resources in the northern Greenwater Valley parcel is based on: 1) USGS map MF 873 "Map Showing mineral Exploration Potential, Death Valley Quadrangle" (R.M. Smith, 1977); 2) Plate 3 of Open File Report 86-10 SAC (G.C. Taylor, 1986); 3) Figure 2 of USGS Bulletin 1709 B (Armstrong et al., 1987); 4) BLM has received no plans of operations for mineral exploration in the northern part of Parcel 4; and 5) outside of the Greenwater Site, the only gold and silver values reported by Johnson, that BLM is aware of, are east of Parcel 4.

The discussion on pages 4-41 and 4-42 does not mention the geophysical trend (magnetic boundary) reported by the USGS in Bulletin 1709-B because the narrative is directed towards areas of moderate and high potential. Although the anomaly offers a possible explanation for the mineralization (hydrothermal deposition along a possible fault), it does not necessarily increase the potential for the occurrence of a mineral resource. In fact, the U.S.G.S. does not show any areas of moderate or high potential for the occurrence of mineral resources in WSA 148 despite the presence of the magnetic anomaly.

87-4 Estimated mineable talc tonnage is given on page 4-41. This is based on a BLM field exam of the exposed vein. Estimated mineable precious metals values are given on page 4-42, based on proprietary data. It is beyond the scope of the EIS to do extensive trenching, drilling, sampling and testing required for detailed reserve and potential reserve study.

87-5 Please pages 4-13 and 4-16 for description of impacts on grazing permittee and minerals exploration and development.

87-6 Subsurface groundwater flow in most of the Greenwater Valley is westerly, toward the monument (Hunt et. al. 1966; Miller 1977) and even some surface flow from the eastern slopes of the Black Mountains enters the Monument via the Furnace Creek Wash. Inclusion of the Greenwater parcel in the Monument would therefore remove threats to Monument groundwater resources posed by developments in Greenwater Valley.

87-7 The NPS is currently evaluating springs in the Black Mountains to determine which require management action. See response to 53-1. Although bighorn can disperse or migrate between various areas of preferred use, there are definite herd centers in the Black Mountains around which herd activity is focused (Wells and Wells 1961, Douglas 1986). Not surprisingly, these herd centers are spring sites, to which sheep return once every 4-5 days in the summer to water. Sheep fidelity to such areas of permanent water is quite high, and some of the herds may even be "semi-isolated" from each other, depending upon whether rams travel from herd to herd during the breeding season. It is therefore unlikely that entire herds migrate between the Black Mountain, and the Greenwater range.

87-8 The contention that California Department of Fish and Game wildlife enhancement programs would be destroyed by transfer of the parcel to NPS is not true. Specifically, the EIS states that both the Greenwater-Ibex area and the Pyramid Peak area are low priorities for the establishment of water development and/or reintroduction of bighorn sheep. If there are in fact no short or long-term plans for guzzlers or reintroduction in those areas, then transfer of the parcels to NPS will not affect CDFG wildlife management plans.

87-9 You are correct in noting that the transfer cannot be accomplished through a plan amendment; it requires a Presidential proclamation. However, a plan amendment is part of the process. See page S-1, last paragraph.

88

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1453 Creswell Drive
Yuba City, CA 95991
October 1, 1988

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Attn: Monuments EIS

Dear Staff Members:

I recently learned that the BLM is proposing to transfer some of its protectorate to the National Park Service (specifically to Death Valley and Joshua Tree National Monument). Although this action would help protect the transferred land, and is therefore desirable, I am concerned about its impact on future protection which will be provided upon passage of the California Desert Protection Act.

My family has been fortunate to camp and walk through Mojave desert and south of Death Valley. We are appalled at the lack of control of wheeled vehicles and cattle in these areas. The desert is too fragile to allow the current seemingly uncontrolled access. The planned transfer seems to us to be only a small step in the right direction.

Please slow down action on this transfer long enough to more carefully consider inclusion of areas such as the Saline Valley in the transfer and to allow for rapid phasing out of cattle grazing on the lands to be transferred.

Sincerely,

Barbara Cordero-Hill

Barbara Cordero-Hill

1

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HIGH DESERT MULTIPLE-USE COALITION
P.O. BOX 1167, RIDGECREST, CA 93555

October 26, 1988

Mr. William Haigh
California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce Street
Riverside, California 92507

Re: THE MONUMENTS DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Haigh:

On October 21, 1976 the Federal Land Policy and Management Act (FLPMA) was approved by both the U.S. Senate and House of Representatives. This 52 page document examines in minute detail all factors concerning the use of the lands within the California Desert Conservation Area (CDCA) and sets forth rules and regulations for that use. How lands are to be managed under the multiple use concept is clearly defined as is also how they are to be protected from "air pollution and inadequate federal management." FLPMA also states that if these lands need more extensive protection that this protection will come under Section 3(d) of the Wilderness Act of September 3, 1964.

The majority of information in this draft EIS and, indeed, the National Park Service's recent history points to an intended management style for the proposed parcels to be transferred that regards the control of people very highly, while relegating any public desires for multiple use, easy access for the handicapped, visible wildlife (whether native or non-native), etc. to a position of obsolescence and non-applicability. The NPS's management of lands in other areas of the country has often shown a deficiency in research with a consequential lack of baseline data upon which to plan goals and objectives for the future of the priceless natural resources under their control. Inconsistency and a preoccupation with the often ill-defined concepts of "wilderness" and "naturalness" mark a land management policy that is incompatible with sensitive desert ecosystems wherein active attempts are being made to restore native plant and animal species to levels that would guarantee the species' survival should catastrophic events, devastating diseases, predator over-populations or other disasters occur.

Each of the ten "Issues Selected for Analysis" in the draft EIS will now be addressed individually.

WILDLIFE

89-1 We believe that certain examples can serve as indicators of the National Park Service's well-intentioned but misguided efforts to manage wildlife-related matters. The best example in this case is the plight of the bighorn sheep within Death Valley National Monument itself. Herewith, several quotes with their sources:

"The bighorn sheep has been declining in the Monument and all actions that could affect them need to be carefully reviewed." (Death Valley Draft General Management Plan, 1988, page 141)

"The bighorn populations in the Funeral Mountains have steadily declined from 145 bighorn in 1961 to 60 bighorn in 1972, and to the current (1987) estimate of 35 bighorn. These declines parallel bighorn populations (sic) declines in DVNM as a whole, those being 900 bighorn in 1961, 600 bighorn in 1972, and 404 bighorn in 1987. The trend can be expected to continue." (The Monuments Draft EIS, 1988, page 3-37)

The lack of hunting (a valuable wildlife management tool) and the lack of predator control would impact wildldife, especially the bighorn sheep and deer populations, in ways that are not adequately addressed in the draft EIS. An adult mountain lion will consume approximately 50 deer or bighorn sheep in a single year and, if predator numbers are allowed to go unchecked, the big game populations could be decimated in a few short years.

It is painfully obvious that the NPS's policy of letting nature take its course may soon result in the bighorn sheep's extinction in Death Valley National Monument. While this is certainly not in the best interests of the bighorn sheep as a species, we submit that neither is it in the best interests of our country. We believe that the majority of visitors to our public lands treasure the chance to hunt or to simply observe wildlife in a natural setting and should be allowed these opportunities.

89-2 Concerning the possible introduction of diseases via cattle, Mr. Glenn Harris, BLM Range Conservationist, Ridgecrest Resource Area, in a personal communication, has stated that he is unaware of any bluetongue disease at this time in the Hunter Mountain area or Owens Valley cattle herds. We maintain that any diseases found in wildlife in the areas around Death Valley could be transmitted via other wildlife and could originate from as far away as Nevada.

The proposed transfer of land from BLM to NPS would do nothing to help the situation. "Bighorn travel extensively throughout the mountain ranges that are contiguous to Hunter Mountain." (The Monuments Draft EIS, 1988, page 3-20) In any case, as shown above, the NPS's "quarantine" theories do not work since cattle grazing has not been allowed on their lands in Death Valley for years and the bighorns continue to decline in numbers. The BLM, along with the California Department of Fish and Game and other interested organizations and individuals are conducting an aggressive program of herd restoration through the provision of watering facilities, immunizations and other means. It is working very well and bighorn populations on BLM-administered lands are increasing. It would be unfair for the Park Service to take over these lands and reverse the progress that has been made in order to further their views that all animal populations should be returned to "natural levels", especially when they have not stated at what point in history the area was in a natural state or how many animals of each species existed at that time.

While the foregoing examples concern only one species, we believe that they serve to illustrate that the National Park Service's wildlife policies are seriously flawed and will result in harm to the native wildlife of the parcels being proposed for transfer. Prior to the appearance of white man, the bighorn sheep was the most numerous big game animal in the area that is today Yellowstone National Park. This has been proven by archaeological excavations of prehistoric fire hearths. Today, the bighorn ranks fifth, after the elk, bison, mule deer and moose. Most involved scientists believe that the elk and bison numbers now surpass the carrying capacity of the land and that native vegetation is being harmed by them. Add to this the Park Service's serious mismanagement of the grizzly bear, an endangered species in Yellowstone, and the facts point to serious inadequacies in the NPS's techniques which should be investigated and corrected before the NPS assumes responsibility for wildlife management on any additional public lands.

We respectfully submit that the BLM's wildlife management policies are superior to the NPS's and that it is much more in the interest of the public and the involved wildlife species for these parcels to remain under the jurisdiction of the BLM.

BOTANY

We believe that the BLM has greater expertise in the management of rare and endangered species via their use of field specialists. In addition, special management regulations for Areas of Critical Environmental Concern (ACEC's) provide the needed protection for state- and federally-listed plants which ensures that the species listed as being present in the North Death Valley and Pinto Basin parcels will receive proper attention under the BLM. "Threats to the survival of the Sodaville milk vetch by burro and cattle trampling were part of the reason that Big and Little Sand Springs were designated as an ACEC in 1983." (The Monuments Draft EIS, 1988, page 3-3). This statement, together with the other information on that page shows awareness on the BLM's part and that the future of this plant species is good. The exclosure at Big Sand Spring, in particular, is helping to guarantee the viability of the Unusual Plant Assemblage (UPA) at that site. Can the Park Service be counted upon to replace this exclosure should it be "damaged by a catastrophic event?" 89-3

89-4 A considerable discrepancy has been noted concerning the Pinto Basin parcel. On page 1-7 of the draft EIS it stated under "Botany" that,"Two BLM sensitive plants occur *in* the Pinto Basin parcel" while on page 3-64 it is stated that one of the species is found *"near the eastern boundary* of the parcel..." with the the other being found "approximately *8 miles to the southeast* of the parcel."

The BLM employs Range Specialists and other authorities who are in a better position, via their close, ongoing assessment of range conditions, to know the actual condition of listed species and to discover any species which *should* be listed but is not. The BLM has shown that they will take decisive action to protect threatened plants when this is called for. In this area, the NPS is something of an unkown quantity, and, in fact, their "hands-off" management style leads one to believe that the active protection of a sensitive species might be avoided with subsequent detrimental results.

LIVESTOCK GRAZING

As stated in the draft EIS,grazing allotments exist only for the North Death Valley and Hunter Mountain parcels. While effective AUM's for the North Death Valley parcel are so limited as to cause little economic effect (from lost production anyway) on the operations of the rancher's family should they continue grazing cattle after his death, the actions that the NPS would take due to expected cattle trespass (page 4-4) are not spelled out. Proposed actions need to be stated in the EIS. 89-5

Hunter Mountain has been monitored over a long period of time by both state and federal agencies for a variety of reasons, therefore, long-term grazing data exists. The draft EIS seems to indicate that compliance with the BLM grazing permit is excellent and that the land is in good condition: "The utilization studies show less than a 20 percent utilization over most of the allotment, including the Hunter Mountain parcel." and, "At present there is an upward trend in condition." (draft EIS, page 3-27) Such being the case, range condition cannot be used as an argument for transferring this parcel to NPS. 89-6

89-7 The NPS plans to discontinue any cattle grazing in this parcel upon the death of the present lessee, should it come under their administration. Reasons for doing so appear to be essentially non-existent, other than the fact that this is the NPS's "way of doing things." It should be noted that,"There are no known BLM sensitive, state-listed rare or endangered plant species in this area." (draft EIS, page 3-25)

The Hunters are a pioneer family who have been the only family grazing cattle in the area for 120 years. They have seen their water rights contested in court (they were upheld) and have had their BLM permit cut in half due to loss of available range when Death Valley was set aside in 1933 and have managed to maintain a viable ranching operation in spite of all this. While the Hunters' operation might survive the loss of grazing rights in this parcel, it could not survive the loss of the only permanent water sources in the area, which originate within the proposed parcel. Should the NPS eventually gain control of this parcel, the Hunter family should be assured in writing that their sources of water will not be affected by NPS activities and will not be contested in an expensive court fight again. Simple indications (draft EIS, Impact #3, page 4-14) are not good enough. 89-8

We oppose this attempt to incorporate this remaining parcel of Hunter Mountain into Death Valley National Monument on the grounds that the Hunters' historic grazing rights and court-upheld water rights should take precedence in this matter and that their activities are original, legal uses of these lands.

WILD HORSE AND BURRO

The NPS and the BLM differ somewhat in their management of these two species. While the BLM would remove all animals from certain very sensitive areas of these parcels, they are bound by the Wild Horse Annie Act to allow the existence of at least small herds where they do not cause undue hardship on other species or irreparable environmental damage. The NPS suffers no such constraints and intends to remove or kill all horses and burros within their jurisdiction. Apparently this is because these species are not indigenous. 89-9

The Park Service goes to great lengths to protect historic mining areas within Death Valley, as rightfully they should. They are some of the most popular attractions in the Monument. On page 2-7 of the draft EIS, under Parcel 4: Greenwater Valley, it says,"The Park Service notes that the transfer would also bring the historic Greenwater Mining District within the monument, thereby enhancing Death Valley's role in representing over a century of mining history of the Northern Mojave Desert." Why is it that the Park Service cannot bring themselves to view the burro in the same light and allow the existence of at least small remnant herds for the "enjoyment of the people." The burro and horse also represent "mining history" and, where they pose no immediate danger to other resources, should be permitted to exist. It is very likely that they would prove to be popular with the public and their presence would be viewed as an enhancement by most visitors to the Monument. After all, the historic mining remains are not "indigenous" either and the NPS not only does not attempt to remove these evidences of man's presence but seeks to actively protect them. 89-10 Could it be that the Park Service would actually like to return the mining areas to their former "pristine" state but knows that the public outcry would be too great? In any case, the wild horse and burro appear to be receiving the brunt of NPS's "naturalness restoration" attempt while it is, in reality, a very contradictory policy.

Believing that the BLM is already removing plenty of wild horses and burros (see draft EIS, page 3-28, paragraphs 1-3), and that a majority of the public is in favor of at least a limited wild horse and burro presence on our public lands, we submit that NPS's strategy for total removal is unacceptable and that BLM should retain control of these parcels.

CULTURAL RESOURCES

While conceding that the National Park Service can do a good job of protecting specific archaeological and historical sites, we find no reason to believe that they can do a better job than the BLM when lands are lightly used such as are the parcels that are the subject of this draft EIS. On page 4-4 (North Death Valley parcel) of the draft EIS it says,"Cultural resources are a non-renewable resource, and by their very nature are in a constant state of deterioration due to natural processes." We take issue with this statement for several reasons. First, it assumes cultural resources are only archaeological or historical surface artifacts/features. Sub-surface artifacts/features are generally preserved in a relatively secure matrix where, for all practical purposes, they are not deteriorating. 89-11 While we do not condone excessive development on public lands, it is a well-known fact that many archaeological sites are discovered as a result of surface disturbance (i.e. road building). Considerable scientific knowledge is often then gained from these sites, whether completely excavated or not, and a site that is considered to be highly significant is often better protected after discovery than before.

We also dispute the statement on page 4-4 because it states that cultural resources are "non-renewable". While true for artifacts and sites, it is not true for uses such as pinyon nut gathering and Native American religious observances. Pinyon nut gathering is addressed on page 4-15 (Hunter Mountain parcel), where it is stated that this activity would be allowed to continue. We do not feel that 89-12 adequate assurances of this are present in the draft EIS since this is strictly contingent upon the DVNM Superintendent’s discretion. Several statements in the draft EIS lead one to believe that vehicular access could be greatly limited under NPS and activities such as pinyon nut gathering will consequently be reduced; page 4-16: "It is not known what impact NPS management will have upon the vehicle access in the Hunter Mountain parcel", and, "The loss of about 1500 visitor use days of hunting, rockhounding and plant byproduct collection opportunities (such as pinyon nuts and flower blooms) would be the most severe impact on recreation...".

Native Americans have reasons to doubt any promises made by the Park Service, which has shown considerable disregard for their feelings in actions such as those concerning the village at Furnace Creek. The NPS granted a request for the village in 1936. A request for a reservation was later essentially ignored. The village agreement was later cancelled. The NPS's attitude can be discerned from expressions such as that the NPS does not feel that a reservation within the Monument would be a "viable alternative because there would be no way to ensure that future uses would be compatible with the monuments legislated purposes." (Death Valley DGMP, page 192) Regarding this proposed transfer, in a letter dated June 14,1988 from the Paiute-Shoshone Tribe, Lone Pine, California, they state that they "ADAMANTLY OPPOSE the creation of another park at Hunter Mountain."

It is a fact that members of the public travel great distances to visit National Parks, Monuments, etc., while these same persons, if not local residents, often do not take the time to visit surrounding BLM and Forest Service administered lands, even though they may be equally spectacular. Creation of a new NPS entity, or inclusion of new lands into an existing one, creates national recognition that often brings many thousands of additional visitors to that entity each year. "Including this parcel within Death Valley would draw special attention to it." (draft EIS, page 4-22) Witness the frequent explosion of use of almost any stream after it is included in the National Wild and Scenic Rivers system. Thus, a certain anonymity (and a consequential degree of protection) remains for the archaeological/historical resources present on BLM lands. For this and the other above-named reasons we believe that protection of cultural resources is best provided by continued BLM management of these parcels.

Please refer to our related comments under Management Presence.

LANDS

We reiterate our concern that excessive development should not be allowed to occur on these parcels. This concern extends to the types of facilities that would be needed if a transfer to the NPS took place with an attendant increase in users requiring additional campgrounds, etc.

On page 4-18 it is stated, "If the transfer results in any modifications of the Death Valley Draft General Management Plan (GMP), the Park Service would likely prescribe acquisition of State and private lands." We submit that the NPS should examine the private property impacts of this transfer in greater detail now. We would appreciate answers to these questions: 1) Would developments/improvements be allowed on inholder lands? 2) Would acquisition be at the discretion of the owner or would condemnation be resorted to? 3) What are the expected acquisition costs including the high dollar values of patented mining claims? and 4) Are the funds available? 89-13

Another concern is the low-level military flights that would apparently continue unmodified after the land transfer. We are in support of the military's right to continue this practice as a necessity to both the national defense and Southern California's economy. Agreements between federal land management agencies and the Department of Defense (DoD) have been reached in the past that prohibit low-level flights over wilderness-type lands. We assert that the time has passed to expect the DoD to further limit its areas available for tactical training. It is stated in several places in the draft EIS that such flights would continue over the transferred parcels, even though this is contrary to accepted practice for wilderness areas. This should be made more clear to all parties involved so that any future actions to reverse the policy (i.e. lawsuits by wilderness advocacy groups) can be prevented.

89-14 The Black Mountains watershed (to be affected by the Greenwater proposal) is important to area hydrology, both stream runoff and underground supplies, and thereby to the communities of Shoshone and Tecopa. In 1983 a proposal was made to study the waters of DVNM but the project was shelved. Approximately two weeks ago the NPS initiated study proceedings as a result of severe public criticism. We believe that prior to any land transfer, this study should be conducted by an impartial third party and the results made known to the public.

We are opposed to the Park Services "let burn" fire control policy. While we concede that fire can have some beneficial effects on wildlife, we feel that the BLM's fire control policies (with options such as controlled burns to prevent fuel load build-up) are more applicable in the terrain of a parcel like Hunter Mountain. Fire control is not adequately addressed in the draft EIS but deserves serious consideration in light of problems experienced by NPS in other National Parks this past summer. 89-15

Our preferred alternative in this case is for the parcels to remain under BLM control as multiple-use lands.

MANAGEMENT PRESENCE

89-16 Statements in the draft EIS concerning patrol frequency indicate that BLM and NPS are roughly capable of patrolling the parcels with equal numbers of personnel. Some parcels are now patrolled more frequently by the BLM than the NPS could manage, while others, it is stated, would be visited more often by the NPS. It is not indicated whether additional NPS personnel would be required or if present staff would simply be "spread thinner". This needs to be addressed. If the NPS assumes responsibility for the parcels with its present staff, will patrols be confined to well-maintained roads due to heavy work load?

Once again, the BLM, having expanded their staff to meet the requirements, is known to be capable of adequately patrolling these particular parcels. It is not known what the NPS could do. No new personnel or ranger stations for the parcels are mentioned in the draft EIS.

RECREATION

We are deeply concerned with the loss of recreation that would take place in these parcels under the management of the Park Service. Death Valley is not located near any large population centers where demand for non-motorized forms of recreation is high. Indeed, statistics should be made available by the NPS showing the number of visitor use days logged by backcountry hikers/horseback riders versus the number for car tourists in the Monuments so that a comparison can be made and so that conclusions can be reached as to why visitors come to Death Valley. Death Valley and Joshua Tree already encompass huge areas of land that are essentially off-limits to all but the hardiest.

In Death Valley alone the NPS administers 1,937,402.63 acres and is recommending 1,908,000 of that (98%) for wilderness designation. Acreage not counted as wilderness includes the width of paved highways and a few other designated routes, Monument headquarters, Scottie's Castle, Stovepipe Wells, Butte Valley, and a small mining area in the Ibex Hills, with the remainder being innaccessible to vehicles.

In the portions of the parcels where the NPS proposes to allow some use of off-road vehicles their policies still contain significant differences from established BLM practices so as to cause one to wonder whether their rules were made as a result of scientific investigation or are merely further extensions of a wilderness ethic: "the BLM permits vehicle use within some desert washes; NPS would not allow such use." (draft EIS, page 4-23)

89-17 One specific policy of the NPS that is in need of clarification is that stated for camping "in their vehicle along designated roads and/or pull-outs..." (draft EIS, page 4-7) In the Death Valley informational brochure and map that is given to every visitor it says under "Park Regulations", "Camp only in designated locations....roadside camping is not permitted". Which is the truth? If the NPS's camping policy is as stated in their visitor brochure then we question whether there would be any camping available at all near these outlying parcels due to financial inability of the NPS to build and operate any new campgrounds. Blackrock Campground, a fully developed and paved campground in Joshua Tree NM, is closed except on rare occasions due to lack of funding for maintenance and upkeep.

89-18 The draft EIS does not address social impacts of the displacement of traditional forms of recreation such as hunting, rockhounding, four-wheeling, etc., which have been practiced by local residents and other visitors for many decades. Also not addressed are some of the newer and growing forms of recreation, such as off-road bicycling, hangliding and ballooning. The latter two would be affected via the inability of "chase crews" to drive to landing sites. 89-19 Vehicular access by Search and Rescue groups may be necessary at times, also. Would this be allowed by the NPS? What are the impacts on lands near these parcels that are to remain under BLM control? They would receive more concentrated use as a result of this proposal. If proof of this is desired, one can examine the Spangler Hills Open Area near Ridgecrest, Ca., which is now receiving intensive use as a result of other motorcycle racing areas being closed to that activity.

WILDERNESS

We are opposed to the creation of any new desert wilderness areas. We feel that ample space and opportunities for solitude now exist for those non-motorized users capable of covering the long distances between water supplies that characterize this region. Nevertheless, the activities allowed by the BLM on their wilderness lands (see appendix 1) are more in keeping with the desires of the general body of users. Transfer of these parcels to the NPS would likely result in virtually instant de facto wilderness management for these lands, while more opportunities for public input exist under BLM before an area is declared a wilderness. Please see our related comments under Recreation, above.

GEOLOGY-ENERGY-MINERALS

The transfer of these parcels would carry with it highly stringent regulations that would effectively end mining activities on these lands. Bill HR3659, passed June 13, 1933, was thought to allow mining in DVNM, but other regulations since propagated by NPS make profitable mining almost an impossibility.

One of the world's largest deposits of wollastonite occurs in the Hunter Mountain parcel. Estimates of the west end resource range upward to 25 million tons of 65 to 85% pure wollastonite. (draft EIS, page 3-35) There are also at least 25 lode claims, 36 association placer claims and two mill sites in this area of high mineral potential. Ores considered stragic to the U.S. which are found in this area are copper, lead, tungsten and zinc. Gold and silver are shown on the map on page 3-34 in the high potential zones but are not really discussed in the text for Hunter Mountain.

In the North Death Valley parcel an $8.5 billion deposit of molybdenum is estimated to be present, along with gold, in the southeast portion of the Sylvania Mountains. A moderate potential for placer gold was found in the northeast as well as the southeast portion of the parcel (draft EIS, page 3-16, 3-17 and 3-18)

89-20 In the Greenwater parcel the USGS has estimated a very high potential for copper porphyry. They also state that shallow gold and silver deposits are running with the porphyry. These deposits have apparently been overlooked by the BLM. A strategic mineral found in this area is cobalt. In the southern section of the parcel are known deposits of talc and gold.

A mineral present in the Joshua Tree area is zeolite. Possibilities for its occurance around DVNM have been less than fully explored.

We have become aware of attempts by NPS to purchase patented mining claims outside of DVNM. This practice should be investigated and explained. In view of the moderate to high potentials for rare earths, strategic and other minerals in these parcels, we believe that the interests of the local economies and the national welfare are better served by leaving these lands under the BLM.

CLOSING STATEMENT

We have attempted to show, in the preceding pages, an inadequacy on the part of the National Park Service to manage the five parcels proposed for transfer in a manner that provides for the greatest good of the majority of the citizens of this country. We recognize that certain lands and features are so spectacular and/or sensitive that they deserve the preservation-type management for which the NPS is so well known. We respectfully submit, however, that most lands falling under that description are already found in National Parks and Monuments.

For reasons of lack of NPS funds, lack of scientific NPS land and wildlife policies, the loss to society of recreational opportunities, and the exclusion of lands with moderate to high mineral potentials, we would like to go on record as supporting an amended Alternative E ("No Action"). These parcels would remain as they are now, under strictly BLM management.

In consideration of the differences between Hunter Mountain's ecology and that of the surrounding lower desert areas and, especially in consideration of the expressed desires on the part of the managing agencies to have the Hunter Mountain ecosystem managed under a single agency, able to provide a more cohesive set of policies, we strongly recommend an amendment to Alternative E that would place the entirety of Hunter Mountain, including the portion now under NPS administration, under the management of the BLM and the CDCA Plan of 1980. This would ensure the protection of all natural and cultural resources, allow the existing recreational, grazing and mining opportunities to continue, while resolving the problems associated with the administration of Hunter Mountain being under two different federal land management agencies with differing mandates and philosophies. We are confident that definite natural bondaries exist which would delineate Hunter Mountain from the remaining Monument lands in such a way as to allow this to take place with a minimum of effort.

Thank you for allowing us to participate in this comment process and thank you for your consideration of our proposal of an Amended Alternative E.

Sincerely,

R Schiller
Ron Schiller, Chairman

Roger D. Nickel
Roger Nickel, Co-Chairman

Mary L. Grimsley
Mary Grimsley, Secretary

Sophia A Merk
Sophia A. Merk, Treasurer

Copies to:

- -Donald Hodel, Secretary of the Interior
- -Ed Hastey, California State Director, BLM
- -Gerald E. Hillier, District Manager, BLM
- -California Desert District Advisory Council
- -Bureau of Indian Affairs
- -President Ronald Reagan
- -Vice President George Bush
- -Senator Pete Wilson
- -Representative Bill Thomas
- -Keith Bright, Inyo County Board of Supervisors
- -The Roy Hunter Family
- -California Desert Coalition

Response

89-1 The contention that Monument bighorn herds are in imminent danger of local extinction is unfounded. The apparent decline in Monument bighorn populations remains just that, an apparent decline, and is unsubstantiated by any rigorous, scientific investigation.

Bighorn number in Death Valley have been notably difficult to estimate accurately. One cannot compare visual observations gained through different methods by different observers at different times of year. Unfortunately, this non-standardized bighorn "censuses" in the Monument since the 1930's when bighorn estimates were first generated for the Monument.

Bighorn herds in the monument have been observed and studies since the 1930's with varying degrees of rigor and success. Sumner (1939) was the first to estimate bighorn numbers in the monument. Based on spring observation and inference from sign, he estimated a population of 500 animals.

Working from a similar database, Welles and Welles (1961) estimated Monument population of 420 in 1955, 800 from 1955-59, and 915 from 1959-61.

Hansen (1972) used helicopter surveys to determine the presence of 23 separate herds in the monument, and an estimated population of 603.

CPSU/UNLV studies have focused on individual herds. Douglas and Kingsley (1981) estimated a total of 60 sheep in the Grapevine Mountains, based on trail, sign, sightings and time-lapse photography at springs. Dunn and Douglas (1985) surveyed the Tin mountain population by helicopter, observing 24 and estimating a total population of 60. In a similar helicopter survey of the Black Mountains, Douglas (1986) observed 30 sheep and estimated a total of 60.

Population trend has been estimated from these present and past population estimations, but is rendered less valuable by limited statistical rigor and a lack of consistent methods.

Ideally, population estimation requires mark-resight techniques that produce population estimates accompanied by some estimate of the variability (standard deviation, standard error, confidence interval, etc.). Since, until recently, none of these techniques has been applied to Monument herds, no statement other than the very general (i.e., "appears to be declining") can be made about Monument-wide populations.

Only recently has a technique been developed for marking sheep such that data gathered may then be used to generate a population estimate accompanied by an estimate of the statistical variability.

Such a mark-resight survey was flown in the Black Mountains of the Monument in July 1988. A population of 76 + or - 28 bighorn was estimated for that range (Douglas 1988), up from the previous estimate of 60 bighorn. Lamb to ewe ratios were approximately 25:100, which indicate a stable population (McQuivey 1978). These data suggest that the herd may not be in imminent danger of extirpation, as originally suggested (Douglas 1986). Similarly, Dunn (1984) found a lamp:ewe ratio of 30:100 for the Quartz Spring herd in the Cottonwood Mountains.

Since 1983 the NPS has implemented a comprehensive and expensive program of burro removal, primarily to eliminated the potential for competition between burro and bighorn. From 1983-86 more than 6,000 burros were live-trapped and removed from the Monument at a cost of 1.3 million dollars. To take the Monument burro populations to zero, the NPS has implemented a direct reduction program since August 1987.

Hunting's use as a management tool is limited to those species for which natural predation has been a significant factor in past population control.

Predators have probably not played a very important role in controlling bighorn population in Death Valley (Welles and Welles, 1961); mountain lion are not resident in the Monument and sightings of transient lions are rare. Bighorn populations are more likely limited by availability of water and forage. Therefore, the lack of predator control inherent in NPS resurvey management policies will not impact Death Valley wildlife, or will lack of hunting.

89-2 Some Owens Valley cattle have tested positive to bluetongue in the Bishop area. Diseases could come from other infected animals, although the most likely source would be the closest sources.

89-3 Upon transfer of the parcel, the NPS would maintain the exclosure at Sand Spring until there was no longer a threat to the plant assemblages from trampling by burro and livestock.

89-4 Please see response to 92-1

89-5 The NPS has a number of options to prevent or mitigate livestock trespass on the North Death Valley parcel. This would include maintaining the existing fencing around Sand Spring; expanding the fencing at the Sand Spring area to exclude cattle from all water sources; and construction of fence along the new boundary in the north of the parcel.

89-6 Range conditions is not an argument for transfer, see page 2-5

89-7 The EIS explicitly states the effects of eliminating cattle grazing from the Hunter Mountain parcel, see pages 4-10, 4-12 to 4-13.

89-8 See response to 64-1.

89-9 See response to 36-1.

89-10 Death Valley National Monument was established to protect unusual features of scenic, scientific, or educational interest. Specific protection plans for these features are elaborated in the monument's 1982 Natural and Cultural Resources Management Plan (NCRMP) and its 1988 Draft General Management Plan (GMP). The burro's status as an historic resource is discussed in the NCRMP:

"while burros have been domesticated for thousands of years, it is unlikely that large numbers of feral burros existed until sometime during the last century. Prior to this time, burros were considered valuable property to the early miners, explorers, and settlers who used them as pack animals and as a means of transportation."

And further, "The burro is regarded by some people as an historic resource -- a symbol of the old West. In Death Valley, the free-roaming burros are not representative of the historic scene. Historically the burro was a domestic animal, valued as personal property under control of the owner. Few, if any, animals were in the wild before the 1900's." Even though this was the NPS position at the time, several other alternatives were considered in the NCRMP to retain burros in certain areas of the Monument. The NPS believes historic resources to be part of the "educational features" which the Monument was established to protect. Since this is not the case, the NCRMP also prescribes protection of historically significant resources and restoration of disturbed areas which are not culturally significant.

89-11 Our statement did not assume that cultural remains are only surface manifestations. However, subsurface materials can deteriorate through time: soils develop and erode; perishable materials decay; and rodents carry away objects and in some instance completely disrupt a site.

89-12 Section III of the Native American Relationships Management Policy (1987) provides specific management guidance for Native American Traditional Activities on NPS lands. For example, the "Superintendent shall provide reasonable access to Native Americans for pursuit of religious activities in the NPS areas in accordance with policies on religious activities and public assembly". Also, "Agency decision-making regarding Native American access to and use of traditional sacred resources for customary ceremonials should reflect the least restrictive regulatory means available."

89-13 That statement should read: Should these parcels be transferred, they would undergo the same management zoning process as described in the monuments's 1988 draft GMP. In answer to your questions:

1) As discussed under "Management Zoning," page 19 of the GMP, "Management zoning determines how specific lands are to be managed to protect resources and to provide for visitor use." As part of this zoning process, the compatibility with monument resources of other possible uses of nonfederal lands, such as development, would be evaluated. Those lands where nonfederal uses were compatible with monument resources were placed in the appropriate zone (for example, lands where mining could be conducted without affecting the monument's features were placed in the exploration/mining subzone). Those lands where nonfederal uses are incompatible with monument resources would be considered in a land protection plan, and protection techniques for these lands, such as acquisition and easement, would be discussed.

2) These protection techniques would be discussed in the land protection plan. Direct compensation and exchange are two of the methods that will be considered in that plan. Condemnation would only be used as a last resort.

3) Acquisition costs will be developed as part of the land protection plan.

4) Funds for acquisition would be available under the Land and Water Conservation Act.

89-14 NPS concerns for the water resources of the Monument date back to the monument's inception on 1933. Information regarding these resources has been collected and evaluated since that time. The need for a more comprehensive approach to water resource management was identified in the 1970's in response to effects of pumping Devil's Hole. Since that study was prohibitively expensive, efforts by NPS have proceeded on an "as needed" basis in several areas. To this end the NPS has funded USGS monitoring of springs in the Ash Meadows area since the 1970's. Also, in 1977 a study, "Appraisal of the Water

Resources of Death Valley, California-Nevada," by G.A. Miller, USGS, was funded by the NPS. The 1982 NCRMP recommended further water resource studies, a call which was picked up by the NPS as the GMP was initiated in 1984 when selected springs from the 1977 study were resurveyed by NPS.

In August of this year a study was funded by NPS to examine the hydrogeology of springs in the Black Mountains. In October of this year the NPS in conjunction with the State Engineer of Nevada and the Bond Gold Mining Company established the need for monitoring the effects of that mining operation. The monitoring plan is presently being developed. Although the comprehensive study has not yety been completed, NPS efforts to obtain needed water resource information with available funding have clearly been demonstrated.

89-15 It is BLM policy to suppress wildfires. When fire is to be utilized as a management tool, a prescribed fire plan is required to be written. Currently, there is no prescribed fire plan for Hunter Mountain.

89-16 Currently all of the parcels involved in the proposed land transfer are on existing patrol routes of NPS rangers. For example in North Death Valley, seven miles of the Big Pine road are currently within the monument; extending this to Crankshaft Junction would add an additional 20 miles on the same road. The north addition would be a simple patrol continuation for NPS. Currently (when the road is passable) Death Valley personnel use the road quite regularly for official and private business - mostly during the winter months when someone form DEVA drives the Big Pine Road daily. Hunter Mountain is also patrolled by NPS Rangers from both Stovepipe Wells and Grapevine, both accessible within two hours driving time. Similarly, Pyramid Peak and Greenwater Valley are also along existing patrol routes. Patrol could also be accomplished more readily with the proposed transfers. Nevertheless, additional NPS personnel will actively be pursued for these areas.

89-16A Exactly the opposite is true according to the NPS 1988 General Management Plan for Death Valley. There are currently an estimated 400 miles of backroads within Death Valley. While much of the monument may be closed to vehicle use, most of the monument can be seen and is accessible from approved roads.

89-17 Your have correctly noted an inconsistency in the NPS visitor brochures. The statement on page 4-7 of the EIS is a correct statement of NPS camping policy taken from the NPS brochure, "Dirt Road Travel and Back Country Camping in Death Valley National Monument." The Death Valley informational brochure you reference is intended for most visitors to the Death Valley "front country" or the first camping zone referred to on pages 4-7 of the EIS. The necessary changes to clarify this will be made during the next printing of the Death Valley informational brochure.

89-18 The impacts from the displacement of traditional forms of recreation such as hunting, rockhounding, four wheeling, etc. will be minimal because there are other areas nearby where such activities can take place. Many opportunities still exist in the area and on the public lands adjacent to the parcels proposed for transfer. There is is very little evidence that offroad bicycling, hang gliding or ballooning occur on more than a random basis in North Death Valley or Hunter Mountain.

89-19 NPS has always, and will continue, to cooperate with necessary search and rescue efforts on any NPS or adjacent lands.

89-20 USGS publications reviewed by BLM do not support the "very high potential" rating. USGS Professional Paper 413 (Drewes, 1963, p. 69) states the possibility that "a larger, unexposed mineralized body might be located....." USGS Bulletin 1709 B (Armstrong,et al., 1987, p. B9) mentions gold and silver occurrences within WSA 148, but did not classify any zones within that study area as having moderate or high mineral resource potential. A BLM geochemical sampling program detected cobalt anomalies in sieved samples from stream drainages in Parcel 4. Geochemical sediment samples alone, however, are insufficient to support a mineral resource rating of moderate or high. Gold and talc mineralization are addressed on pages 4-23 and 4-24.

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RIDGECREST, CALIF. 93555

October 26, 1988

Mr. William Haigh, Chief, Planning Staff
California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, Ca. 92507

Dear Mr. Haigh,

We, the members of the Gear Grinders 4WD Club, Inc., hereby request to on record as being opposed to the land exchange of Bureau of Land Mangement (BLM) managed lands into the National Park Service (NPS) of Death Valley National Monument (DVNM) and Joshua Tree National Monument (JTNM). We feel that under the California Desert Conservation Area Plan of 1980, more than adequate protection is being provided, and yet the Multiple Use concept is also being addressed.

WILDLIFE

Under the CDCA Plan, the BLM, with help from the Society for the Conservation of Bighorn Sheep and volunteers, and the Department of Fish and Game, is enjoying increases in the bighorn sheep population on BLM managed lands. On the other hand, "The Bighorn populations in the Funeral Mountains have steadily declined from 145 bighorn in 1961 to 60 bighorn in 1972, and to the current (1987) estimate of 35 bighorn. These declines parallel bighorn population declines in DVNM as a whole, those being 900 bighorn in 1961, 600 bighorn in 1972, and 404 in 1987. The trend can be expected to continue." (The Monuments Draft EIS, page 3-37)
We believe the bighorn sheep should be left in the capable management hands of the BLM.

BOTANY

The CDCA Plan provides protection for state and federally listed rare and endangered species by setting up Areas of Critical Environmental Concern (ACEC's), as is the case of the sodaville milk vetch in the North Death Valley parcel. There are no state or federal listed rare or endangered plant species, or known to have present any candidate or BLM sensitive plant species in the Hunter Mountain, Pyramid Peak, Greenwater Valley, or Pinto Basin parcels.

LIVESTOCK GRAZING

Being on various mailing list's, BLM included, we are aware of the plight of Mr. Roy Hunter and the Hunter Family. Since 1865, Mr. William Lyle Hunter and decendents have been grazing cattle on Hunter Mountain, hence the name. In 1933, the NPS removed 50% of those grazing lands from the Hunter family's use. However, in remaining parcel, "utilization studies show less than 20 percent utilization over most of the allotment," (page 3-27, the Monuments Draft EIS) which should translate into the range is in great shape. Also in the remaining parcel, a 1967 court decision upheld the

Hunter family claims to the water rights on Hunter Mountain. Now their grazing rights are in jeopardy of being taken away by this unfair and unfounded land transfer by the NPS. We do believe we're living in America, where these pioneer rights should be protected by the United States Constitution.

WILD HORSE AND BURRO

As we travel through DVNM, we no longer see the burro, which was always a thrill and a reminder of those hardy miners and pioneers. We contend that under BLM management, small herds of both burros and wild horses are allowed to roam where they will not cause irreparable damage to the environment. The burros and wild horses are a reminder of the past, a link to those by-gone days, and a definate attraction for visitors. However, now driving out across DVNM, the landscape (no manner how beautiful) is now devoid of any visible wildlife, as most wildlife does not wish to be seen or is nocturnal. The Lee Flat Herd Management area, adjacent to the Hunter Mountain parcel, prescribes the maintenance of up to 30 head of burros. We believe the small herd of 15 horses and 10 burros using the area around the Spanish and Dead Horse Springs should also be maintained. If not, what of the burros of the Lee Flat HMA that possibly drift into the proposed Hunter Mountain parcel? Would they be shot by NPS personel, as is now practiced within the boundaries of DVNM?

CULTURAL RESOURCES

We would like to see the Native American's rights remain protected as they are now by the BLM's allowing their freedom to collect native materials, observe cultural rites, and allow the spiritual significance of Hunter Mountain to remain unincumbered. The past record of the NPS's handling of the small tribe within DVNM leaves a lot to be desired, and Native American uses are incompatable with NPS guidelines.

LANDS

The acquisition of private lands and the cost of these possible acquisitions has not been thoroughly discussed in the Draft EIS. If these private land holders do not wish to sell out to the NPS, will condemnation proceedings be used?
As stated in the Monuments Draft EIS, North Death Valley - page 4-5, Hunter Mountain - page 4-16, Pyramid Peak - page 4-18, and in the Greenwater Valley - page 4-21 parcels, the DoD does not intend to give up their air space for low-level flight testing. The 200-foot above ground level altitude is not compatable with the NPS, so the land transfer should not be pursued for these parcels.

MANAGEMENT PRESENCE

The BLM, having recently expanded their staff, should be able to patrol these parcels on a frequent and regular basis. On the other hand, the NPS makes no mention of adding more personel, if they need to, or will the present personel be covering larger areas. If more are needed, the cost of these extra personel needs to be addressed.

RECREATION

Our recreational needs revolve around the use of 4-wheel-drive vehicles. We are members of the California Association of 4 WD Clubs, Inc, and have two Adopt-a-trail Agreements with the BLM and one with the Sequoia National Forest. We are an educated and responsible vehicle use group, and know of the ongoing process of educating the public to the responsible use of our public lands. In the desert areas, a vehicle is a necessity for carrying ample water and provisions, so as to wander the routes of travel in these vast areas safely. In connection with the use of our vehicles is backcountry camping, vehicle touring and sightseeing, photography, ghost-towning, rockhounding, hunting, and exploring. Most of us participate with our families, along

with our friends. We feel this is a good, wholesome recreation the whole family can enjoy together, something that is generally lacking in todays society.
The loss of the recreational opportunities on these five parcels, and more importantly, the Hunter Mountain area which is closest to us, under NPS management will be great. Under the CDCA plan, the multiple use of the public lands is high priorty, and is managed to best suit the needs of the land as well as the public. With NPS controll, none of todays acceptable multiple uses would be allowed, except vehicle use on the ROADS (no designated "routes of travel"), hiking, and very strict guidelines as to where you can or cannot camp.
So on the basis of severe loss of recreational opportunities on public lands, we do adamantly oppose the land transfer for all five parcels.

WILDERNESS STUDY AREAS

If indeed land within a parcel meets the 1964 Wilderness Act criteria for lacking the evidence and works of man, does not include high or moderate potential for minerals, and does not infringe on prior existing rights of a rancher or miner, then we would probably not have a problem with a WSA being designated wilderness.
In the case of the Hunter Mountain WSA No. 123, we have a problem with it being considered for wilderness. There are a limited number of routes of travel, but only BLM Route No. S112 into Spanish Spring has been proposed to be left open in a Class L area. With the closure of all the other routes of travel, camping and other recreational uses (hunting, rockhounding) will be concentrated around the Spanish Spring area, causing over use.
Also, high and moderate potential for minerals in the Northern part of the Hunter Mountain parcel, along with the Hunter family grazing allotment, make WSA No. 123 unsuitable for a wilderness designation. However, the Panamint Dunes WSA No. 127, if it truly, as stated in the Monument Draft EIS, is lacking of the evidence of the work of man, lacks mineral potential or existing mining claims, and is not infringing on the Hunter family grazing right, may be suitable for a wilderness designation.

GEOLOGY - ENERGY - MINERALS

No parcels which contain a high or moderate potential for minerals, strategic minerals, or rare earths should be transferred to the NPS control, nor should they be put into wilderness.

North Death Valley - Approximately half of this parcel has moderate potential for placer gold, and in lesser degrees, silver,some mercury, boron, limestone, gysum, and sulphur. A high potential for molybdenum in a small area in the nrth of the parcel, and a high potential in a small area in the north west for gold, mercury, and sulphur exists.

Hunter Mountain - A high potential in the northern section of the parcel exists for gold, silver, lead, zinc, and wollastonite. A moderate potential for copper, tungsten limestone, and again gold, silver, and lead.

Pyramid Peak - A high potential for sand & gravel in the southern part of the parcel exists, along with a moderate potential for borates. Moderate potential exists in the rest of the parcel for the following: limestone, dolomite, silica, borates, and small amounts of clay and zeolite.

Greenwater Valley - A small part of the northern part of the parcel contains moderate potential for barium, copper, and gold. The central part of the parcel does not show any minerals present, except for a small area for perlite. However, the southern portion of the parcel is a high potential area for gold, silver, lead, copper, talc, zinc, and moderate potential for geothermal.

Pinto Basin - A small portion of the parcel contains moderate potential for copper, gold, and lead.

With the mineral potential's in the first four parcels being high and moderate and including large amounts of acreages in each parcel, they should not be considered for transfer to NPS control, which would virtually stop all chances of future discovery, developement, and extraction of important minerals.

In conclusion,, and after reading the EIS, we believe that the best interests of the public, the wildlife, the rancher, the miner, and the recreationalists would be best served if the five parcels were left in the management of the BLM under the CDCA Plan guidelines for multiple use. We support Alternative E, no action.

Thank you,

William R Maddux
William R. Maddux, President

Jeffery J. Tunnell
Jeffery J. Tunnell, Vice-president

Bowen W. Shaw
Bowen W. Shaw, Secretary

Copies to:
Donald Hodel, Secretary of the Interior
Ed Hastey, California State Director
Gerald E. Hillier, District Manager
President Ronald Reagan
Vice-president George Bush
Bureau of Indian Affairs
California Association of 4WD Clubs, Inc.
California Desert Coalition
BLM Desert Advisory Board
Senator Pete Wilson
Congressman William Thomas
Keith Bright, Inyo County Board of Supervisors
The Roy Hunter Family

mlg

91

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2:39
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Mr. William Haigh
California Desert District
Bureau of Land Management
Attn: Monuments EIS
1695 Spruce Street
Riverside, CA. 92507

Dear Mr. Haigh:

I am writing to express my families concerns with the proposed Death Valley and Joshua Tree national monuments additions.

Our most urgent concern is the loss of significant recreational opportunities. At present most of the area is managed by the BLM for multiple-use and sustained yield which we feel better meets the public need. The EIS is very clear that much if not all of the land currently classed by the BLM as intense use, moderate use, limited use, and closed will be managed with little or no vehicular access. Most of these areas in no way even remotely meet the guidelines for this ridgid classification under the Federal Lands Management Policy Act of 1976 and it is beyond our comprehension as to how land currently classed as I or M could even remotely be considered for wilderness management. The EIS recognizes significant established recreational uses for each parcel including upland game bird hunting, big game hunting, gem and mineral collecting, pinyon nut gathering, motorized back country exploring, ballooning, hanggliding, OHV opportunities, trapping, vehicle camping, backpacking, and hiking. Of these opportunities only hiking and backpacking would likely be allowed but in most areas even these activities would be severly restricted due to a lack of available water and lack of vehicular access to a desirable starting location to allow a reasonable distance to reach significant destinations. 91-1 The EIS does not address the social loss or economic loss due to the removal of recreational opportunities nor the social impacts of the loss of opportunities for solitude for people unable to particpate in non-motorized activities. The EIS also neglects to address the impacts the removal of the recreational opportunities would have on other public lands due to the further concentrated recreational over use.

Wildlife management is another area of concern which is not appropriately addressed by the EIS. While the rational for each area addresses the concern for the management of bighorn sheep and the implied inprovement of the conditions under park service management, the EIS recognizes the serious declines of this species within the monument boundaries. In addition, new guzzlers and habitat improvements would not be allowed nor would the replacement of existing guzzlers. We take exception to the conflicting statements and question if the monument administrators have a genuine concern for the bighorn sheep or more concerned with the enlargement of the monument for unfounded pretegious reasons or purely blind preservation. If the administrators are concerned with the management of wildlife why is predator control not addressed? We strongly feel that all areas that involve dual management of bighorn sheep habitat should be managed exclusively by the BLM and Dept. of Fish and Game.

The inclusion of significant mineral deposits including an extremely large and rare deposit of woolastonite of which only a few are known to exist world wide, California's largest known deposit of sulphur, and many other known deposits of valuable and strategic minerals into the national monument is quite disturbing.

91-2 The EIS seems to avoid the issue of private property and does not mention if the aquistion will be voluntary, if developement or improvement will be allowed, what the associated costs will be or where those funds are available.

One only has to read the environmental consequences of Alternative "E" to determine that the BLM is currently addressing all of the sensitive issues and nothing will be lost or jeopardized while still allowing multiple-use and sustained yield and providing for current recreation, to realize that this is the most appropriate choice of management better meeting the needs of the public.

Thank You,
The Schiller Family

The Schiller Family
1163 S. Garth St.
Ridgecrest, CA. 93555
(619) 375-2629

Copies to:
Donald Hodel, Secretary of Interior
Ed Hastey, California State Director, BLM
Gerald E. Hillier, District Manager, BLM
California Desert District Advisory Council
President Ronald Reagon
Vice-President George Bush
Senator Pete Wilson
Representative Bill Thomas
California Desert Coalition

Response

91-1 The changes in recreational activities are noted for each parcel and a summary of differences between BLM and NPS is given beginning on pages 4-7 to 4-8 in Table 4-1.

91-2 The private land, described in the relevant Lands section of the EIS, does not exceeded 1200 acres, less than one percent of the total land considered; and NPS acquisition is also noted in the relevant Lands section and Chapter 4-Environmental Consequence.

92

October 26, 1988

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2:38
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District
Bureau of Land Managment
Attn: Monuments EIS
1695 Spruce Street
Riverside, Ca. 92507

Re: The Monuments - Draft Environmental Impact Statement

Enclosure (1)

To whom it may concern, MR. HAIGH,

On September 26, 1988 I wrote a statement to the Hearing Officer when a hearing was held in Lone Pine, California on September 27, 1988. Please see enclosure (1). My main point from this letter was that I felt the BLM was prividing adequately for the protection of these lands, versus the NPS would not by complying under the multi-use that was specified under the FLPMA Act of 1976 for these lands. There are a few additional points that I would like to interject at this point.

According to the Monuments Draft EIS, page 3-37, "The bighorn populations in the Funeral Mountains have steadily declined from 145 bighorn in 1961 to 60 bighorn in 1972, and to the current (1987) estimate of 35 bighorn. These declines parrallel bighorn populations declines in DVNM as a whole, those being 900 bighorn in 1961, 600 bighorn in 1972 and 404 bighor in 1987. The trend can be expected to continue." By their own admission, the NPS states they are not taking better care of the bighorn than the BLM which has had an increase of their federally managed lands. Their statements and allegations of the bighorn dying from exposure to cattle in the Hunter Mountain are totally non supported. I believe that the BLM's wildlife management policies are superior to the NPS.

Also in my letter (enclosure 1), I bring up the points listed in the DGMP regarding the rare and endangered species exising in the monument already, but regarding the Monuments Draft, EIS, page 3-3. "Threats to the survival of the Sodaville milk vetch by burro and cattle trampling were part of the reason that Big and Little Sand Springs were designated as an ACEC in 1983." Special management regulations for ACEC's provide the needed protection for state and federally listed plants. The BLM recognized there was a problem, in so ensured that additional protection was needed and provided same. NPS does not have these types of management already in place as the BLM has.

92-1

Regading the Pinto Basin area. On page 1-7 of the EIS it states, "Two BLM sensitive plants occur in the Pinto Basin parcel", but on page 3-64 it states that one of the species if found "near the eastern boundary of the parcel" with the other being found "approximately 8 miles to the southeast of the parcel." Just as a point I would like somebody to check these discrepancies out.
Regarding the livestock grazing, i.e.,"The utilization studies show less than a 20 percent utilization over most of the allotment, including the Hunter Mountain parcel. At present there is an upward trend in condition." (EIS, page 3-27) Range condition cannot be used as an argument for transferring this parcel to NPS. "There are no known BLM sensitive, state-listed rare or endangered plant species in this area", page 3-25.

Regarding the cultural resouces. In the EIS, page 4-4 it states that cultural resources are non-renewable. While this statement is true for artifacts and sites, it is not true for pinyon nut gathering and religious gatherings and med dicanal harvesting. I still feel that adequate assurance has not been provided to the Native Americans that utilize this area today. As I point out in enclosure (1), historically the NPS has not been exactly truthful with the Native Americans in the past in the already existing monument.

I would also like to touch briefly on the watershed of the townships of Shoshon and Tecopa. The surface waters and groundwaters of this area have not been analized in detail. However it is a known fact that water does run downhill. I believe that the watershed of the Black Mountains should be clearly identifie before possible exclusion of this range is made. The after effects of this decision could be a hardship on these desert towns, plus the economy of Inyo County.

These parcels have also been identified as having highly valuable minerals. In the Hunter Mountain area one of the largest wollastonite deposits exist. The EIS states 25 million tons of 65% to 85%. There are at least 25 lode claims and 36 associated placer claims. There are at least two mill sites in this area that wouldbe affected. Gold and silver are also found in this area. In the N. Dath Valley parcel an $8.5 billion deposit of molybdenum is estimated along with placer gold. In the Green water area, the USGS has estimated a very high potentiial for copper prophyry. These deposits have been up to now greatly overlooked.

I am also greatly upset with the NPS to try to purchase patented mining claims outside of the Monument. This practice, if true, should be stopped.

Very truly yours,

Sophia Anne Merk

Sophia Anne Merk
2062 Mike's Trail Road
Ridgecrest, California 93555

Response

92-1 Only one BLM sensitive species, Foxtail cactus, is located in Pinto Basin. The second species, California snakebush, is not within Pinto Basin; and having a C3 status was incorrectly identified as a BLM sensitive species. The text has been corrected.

Mary L. Grimsley

1012 N. Sierra View
Ridgecrest, CA 93555
619-446-3458

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2:38
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 23, 1988

Mr. William Haigh, Cheif, Staff Planning
California Desert District
ATTN: Monuments EIS
1695 Spruce Street
Riverside, Ca. 92507

Dear Mr. Haigh,

Generaly speaking about the entire plan, the original boundaries drawn for both Death Valley and Joshua Tree National Monuments, were drawn to exclude valuable mineral deposits, existing grazing rights, and recreational uses of the time. These uses continue today, and to adjust the boundaries would exclude present recreational uses (hunting, rockhounding, backcountry vehicle touring, camping & sightseeing); Mineral discovery and extraction (modern technology is in need of existing and new minerals and rare earths); existing grazing rights (120 + years of grazing by the Hunter family will be detrimentally affected on Hunter Mountain); water rights will be affected (the Hunter family has claims to the water rights upheld by a 1967 court decision, which should have precidence over the boundary adjustment); and the Native American's right to gather native materials for food and cultural activities could be restricted and/or heavily regulated.

All of these uses, which are all allowed under the California Desert Plan - 1980, which manages the BLM lands under a "multiple-use" concept, are not compatiable with National Park Service (NPS) guidelines (see attachments 1 - 3). To circumvent the California Desert Plan's "multiple-use" mandate, and in its place substitute the NPS guidelines for management, is both unfair and descriminatory to the public. I am not in favor of uncontrolled uses and development, but, for conservation of natural resources. I am against people running rampant over the public lands, but, I am also against it being closed off to the responsible users or so heavily regulated, that only a select few will get to enjoy the backcountry.

I would now like to address the following issues, though most comments will reflect on the Hunter Mountain area, of which I am most familiar.

1. WILDLIFE
The Department of Fish and Game, with the help of the Society for the Conservation of Bighorn Sheep, and the BLM are experiencing a significant increase in their bighorn sheep populations on BLM lands, which in turn is allowing the re-introduction of bighorn into other historic grazing areas. The removal of burros, the use of guzzlers as water sources, and innoculations have helped with these increases. The use of guzzlers and innoculations are both contrary to NPS regulations, along with any type of wildlife manipulation, which shows with the decrease in bighorn populations with Death Valley National Monument (DVNM) boundaries (page 141 of the DVNM Draft General Management Plan (DGMP).

2. BOTANY: Hunter Mountain
"There are no known BLM sensitive, state-listed rare or endangered, or Federally

listed threatened or endangered plant species in this parcel." (page 3-25 of the Monuments Draft Environmental Impact Statement (MDEIS)).

3. LIVESTOCK GRAZING: Hunter Mountain

   "Since 1868 the Hunter family has been the sole grazier of the Hunter Mountain area." and

   "Historically, the area of use included the Hunter Mountain area east to Cottonwood Canyon." and

   "Part of the original area of use is now within the DVNM. The DVNM lands constituted 50% of the area grazed when they were set aside in 1933." (All of the above statements are found on page 3-25 of the MDEIS)

   "The utilization studies show less than 20% utilization over most of the allotment, including the Hunter Mountain parcel. (page 3-27 - MDEIS) and

   "In 1898 and 1899, W.L. Hunter, in support of his grazing use, filed claims on the water rights for all springs and streams in the Hunter Mountain area. A 1967 court decision upheld Mr. Hunter's claim to water rights there." (page 3-27 -MDEIS)

   The above statements show prior historic, existing rights to both grazing and water uses. These are "grandfather" rights, and not only should the other 50% of Hunter Mountain be considered given back to the Hunter family, but a continual Family Lease for grazing in the Hunter Mountain parcel should be considered. Not a Lifetime lease, which would run out with the death of Roy Hunter, but a "Family Lease", which would guarantee the Hunter family grazing rights for all eternity. And, with returning the 50% of lands now in DVNM, that would solve the divided ecosystem.

4. WILD HORSE AND BURRO: Hunter Mountain

   "Wild horses and burros have accounted for most of the grazing use in the Hunter Mountain area in recent years, . . ." and

   ". . . between 1978 and 1985, about 2,300 burros were removed from the Hunter Mountain grazing allotment." (page 3-28 - MDEIS)

   Approximantely 15 horses and 10 burros remain and "current management goals call for their removal." (page 3-28 - MDEIS)

   I agree that 2,300 burros were too many for the area and their removal was a necessary action, however, I am totally against complete removal of this small herd of horses and burros, however, at Spanish and Dead Horse Springs, and I support the maintenance of up to 30 head of burros in this (Lee Flat Herd Management Area) herd management area. Once gone, these small herds, a part of our pioneer/mining history, cannot never be replaced.

5. CULTURAL RESOURCES: Hunter Mountain

   "During interviews during the 1970's with Native Americans, contemporary use of Hunter Mountain was described as pinyon collecting and religious observance. The mountain has particular spitual significance to the Native American community." (page 3-28 - MDEIS)

   These lands should remain free to access by the Native American's, for when and whereever they need access. NPS guidelines find Native American uses and needs incompatable, On page 192 of the DVNM - DGMP, the NPS does not feel that a reservation within the Monument would be a "viable alternative because there would be no way to ensure that future uses would be compatible with the monuments legislated purposes." It also states that the traditional lifestyle of the Native American were increasingly affected by the complex new legal institutions. In 1936 the NPS agreed to set aside an area in Furnace Creek for a village, however, in 1938 and 1942, the Indian Council petitioned to have a reservation. The petition was technically denied by the NPS, as they did not send~~ing~~ their request or petition on to Congress. Then, in the 1950's and 1960's, the NPS cancelled the village agreement. Finally, in 1983, the Native Americans were again recognized with grants from the Bureau of Indian Affairs. It was only after help from the Bureau of Indian

Affairs, that the NPS welcomed these Native Americans. Again, "The mountain has particular spiritual significance to the Native American community." If NPS history speaks for itself, it would only be a matter of time before undue restrictions and/or non-entry to this mountain would soon be enforced. Religious and spiritual freedoms are guaranteed in the U.S. Constitution.

6. LANDS: Hunter Mountain
"There are no private lands in this parcel. The public lands are classified Multiple use Classification R-1250, pursuant to the Classification and Multiple Use Act of 1964." (page 3-28 - 3-29, MDEIS) and
"The parcel is within the Complex 3 of the R-2508 Military Operations Area. Military aircraft use of the area is authorized above 200 feet above ground level." and
"A four-mile-wide flight corridor . . . crosses the western edge of the parcel. It is used by formations of planes as well as individual aircraft." (page 3-29, MDEIS)
Multiple use means a greater cross-section of the public may recreate and work on their public lands. The NPS would limit and/or restrict the public from a wide selection of multiple uses now permitted on these lands, and the freedom of pursueing these uses in a responsible manner.
Our freedom is also dependent up the military's ability to use the air space, which would be severly curtailed or restricted, EXCEPT . . .
"Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense (DoD) airspace users would not agree to modify the current 200-foot AGL over the transferred lands. Self imposition of a 3000-foot AGL floor over the transferred lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements."
"The proposed action would be inconsistent with the Inyo County plan which calls for open spaces and multiple use management of the area." (page 4-16, MDEIS)
As the above statements show, the DoD does not intend to give up their use of the air space, which in turn is then incompatable with NPS guidelines. So again, the Hunter Mountain is not suitable for transfer.

7. MANAGEMENT: Hunter Mountain
With the increased BLM ranger presence, "the ranger can visit the parcel three times each week" (page 3-29, MDEIS), any uses not consistant with CDCA guidelines can be delt with immediately. With the ranger's residence being moved to Lone Pine, and the area he has to patrol being smaller than before, he may also be able to be in the area even more than predicted.

8. RECREATION: Hunter Mountain
"The scenic vistas and broad spectrum of terrain types," . . . "make this a popular area for vehicle camping, hiking, backpacking, deer and quail hunting, trapping, pinyon nut collection, rockhounding and vehicle touring." (page 3-29, MDEIS) and
"Recreational opportunities in the Hunter Mountain area are limited by the steep topography and the small number of vehicle trails." (page 3-29, MDEIS) and
"All vehicle travel is required to stay on existing routes of travel." (page 3-31)
In your own text on page 4-16, you admit to "Long term recreational use of the Hunter Mountain parcel would definitely change under NPS management. The loss of about 1,500 visitor use days of hunting, rockhounding, and plant byproduct collection opportunities (does this include Native Americans, too ?????) . . . would be the most severe impact on recreation ." I have included a copy of Table 1, - "Comparison of Management Restrictions on Recreational Resources - BLM and NPS Jurisdiction", for your reveiw (see attachment 1). A summary, however, shows what is now allowed on BLM public lands and what will not be allowed on NPS property:

the BLM allows:	the NPS does not allow:
registered and "green sticker" vehicles	NO "green sticker" vehicles
vehicles on all "routes of travel"	only on approved/designated "roads"

the BLM allows:	the NPS does not allow:
dispersed vehicle camping	dispersed vehicle camping without a multituded of rules and regulations
pets in the backcountry and not at all times on a leash	pets in the backcountry and must be on on a leash at all times
hunting and target shooting	hunting of any kind, and all firearms & archery equipment must be broken down and out of view
rockhounding, and the collection of vegetative by-products by the public	the collection of minerals, rocks, or vegetative by-products
mineral developement under strict guidelines	mining in any form

The BLM is fulfilling the MULTIPLE USE NEEDS OF THE PUBLIC, and should remain the custodian of the Hunter Mountain parcel.

9. WILDERNESS STUDY AREAS: Hunter Mountain

1. Hunter Mountain WSA - No. 123 - I disagree with the BLM recommendation for WSA No. 123 to be "preliminarily recommended suitable for wilderness designation," and "A 3,090 acre area around Spanish Spring (accessed by BLM Route No. S112) has been proposed to remain in Class L." (page 3-31, MDEIS)
Under Recreation the statements: "Recreational opportunities in the Hunter Mountain area are limited by the steep topography and the small number of vehicle routes." (page 3-29) ALL existing "routes of travel" should be recognized and designated open to allow for more dispersed vehicle use, to advoid over-use of the Spanish Spring area, and to allow for the continued dispersed camping in already "camped" spots. The "steep topography" will not allow unauthorized trails to get started. The designation of ALL EXISTING "routes of travel" will also disperse hunting and rockhounding opportunities.
I am also opposed to the wilderness designation in connection with military use of air space over the area. Fly-overs are now at 200-feet AGL, but to be in accordance with the 1964 Wilderness Act, fly-overs would be restrcited to 3,000 feet AGL, EXCEPT . . .
"Noise and visual impacts associated with existing military aircraft operations are expected to continue, as the Department of Defense (DoD) airspace users would not agree to modify the current 200-foot AGL over the transferred (would also be true of wilderness lands) lands. Self imposition of a 3000-foot AGL floor over the transferred (wilderness) lands is considered by DoD to have an unacceptable adverse impact on military flight operations and training requirements."
Also, if the BLM designated Hunter Mountain as wilderness, the grazing rights of the Hunter Family would be phased out (in accordance with the 1964 Wilderness Act), and there should be grandfathered protection of these rights.

2. Panamint Dunes WSA - No. 127 - If indeed there is a lack of evidence of the works of man, and the Hunter grazing allotment does not extend into this WSA, then I would not have a problem with this being a wilderness.

10. GEOLOGY - ENERGY - MINERALS: Hunter Mountain
"Mineral exploration and extraction is governed under the Mining Law of 1872 (and amendments), the Mineral Leasing Act of 1920, the Mineral Materials Act of 1947 (. . .), the Geothermal Steam Act of 1970, the Federal Land Policy and Management Act of 1976 and the Interim Management Policy and Guidlines for Land Under Wilderness Review." and
"Federal land within the parcel is open to mineral location and entry under the Mining Law of 1872." (page 3-31, MDEIS)
The past mining history and production of the parcel, which is within the Ubehebe District, showed high concentrations of gold, lead, zinc, copper, tungsten, silver, and wollastonite. "The Lippincott Mine, which adjoins the parcel, was one of the major lead-silver-zinc producers." (page 3-33, MDEIS)

"A review of the BLM mining claim records (April 12, 1988 version), documents the existance of 25 unpatented lode claims, 36 association (160 acres) placer claims and 2 mill sites." and
"To the south of the Lippincott lead mine, the zone of Palenzoic carbonate sedimentary rocks has a high potential for occurance of gold, silver, lead and zinc. A larger area surrounding the high potential zone has a moderate potential for the occurrence of copper and, in the northeast, molybdenum and tungsten. The northeastern part of the parcel has a high potential for the occurrence of wollastonite, silver, and lead." (page 3-33, MDEIS)
""Although wollastonite itself is not rare, it's occurrence in relatively large, pure masses is very unusal. According to available literature, only a few rich deposits are known throughout the world. Production of commercial grade material has been developed from ore bodies near . . . the Hunter Mountain area . . ."" Summarized from Clark (1980). (page 3-35, MDEIS)
"A confidential report prepared by Moore and Taber (1985) presented an analysis of the J.O. property located on the parcel. Total volumne of all categories (measured, indicated, and inferred) of reserves was estimated to be 18,000,000 tons (or more) of ore containing an average of 60 percent wollastonite." and
"Interspace Corporation, the principal producer of Wollastonite in the United States, may mine this deposit in the future since current deposits in New York State are being depleted. (California Division of Mines and Geology 1985)" (page 3-35, MDEIS)
"The transfer of this area to Park Service management would cause significant negative impact on future mineral exploration or development of the area." and
". . . the potential for future development of mineral resources such as gold, silver, lead, zinc, molybdenum, copper, limestone and wollastonite may be reduced or eliminated. Of particular consequence is the potential loss of the strategic minerals copper, lead, silver, and zinc that have an identified potential for occurrence in the Hunter Mountain parcel." (page 4-17, MDEIS)
We simply cannot afford, as a Nation, to put land of high mineral potential into wilderness or NPS controll. The loss of these lands will force us to go to foreign sources and become dependent upon them for our minerals. The California desert has the highest mineral potential in the United States, and it would be prudent to keep these lands open for mineral discovery, exploration, entry, and/or extraction. Also, the existing lode claims and placer claims, as well as mill sites need to be taken into consideration. I believe in prior existing rights.

This concludes my point-by-point discussion of the issues. Although I have primarily addressed the Hunter Mountain parcel, looking through and reading about the other parcels, some of the statements still apply. This statement, however, would have been so lengthly if I had commented on each issue and addressed it to each parcel, no one would have read it.

In closing, I would like to go on record as supporting Alternative E for all parcels except for the Hunter Mountain parcel. For the Hunter Mountain parcel, I would like to support the High Desert Multiple-Use Coaltions suggest for another alternative, namely, that the 50% of the parcel now within the DVNM be put into the hands of the BLM and managed under the CDCA Plan of 1980. This would solve the issue of bringing the parcel "under the jurisdiction of a single agency." (page S-1, MDEIS) as well as allowing the Hunter family to continue their historic grazing and use of their water rights, the multiple-use of the area would continue (recreational as well as mining), and the resistance of the Department of Defense to give up air space over Hunter Mountain which does not make the Hunter Mountain parcel suitable for transfer to the NPS, would be aleviated. The other four parcels (in most part) have a high to moderate potential for minerals, do not contain state or federal-listed endangered plants, or candidates or BLM sensitive plants (except for the Sodaville milk vetch in the North Death Valley parcel, which is in an ACEC), and recreational opportunities would be lost.

Thank you for allowing me to participate in this process and for reading my comments. I hope the right decisions will be made.

Sincerely,

Mary L. Grimsley

Copies to: Secretary of the Interior, Donald Hodel
Ed Hastey, California State Director
Gerald Hillier, District Manager
Bureau of Indian Affairs
President Ronald Reagan
Vice-president George Bush
Senator Pete Wilson
Congressman William Thomas
California Desert Coalition
BLM Desert Advisory Council
Keith Bright, Inyo County Board of Supervisors
The Roy Hunter Family
California Association of 4WD Clubs, Inc.

mlg

94

KAISER STEEL

KAISER STEEL CORPORATION
EAGLE MOUNTAIN IRON ORE MINE ◆ P. O. BOX 158
EAGLE MOUNTAIN, CALIFORNIA 92241

Certified Mail No. P 496 327 097

October 26, 1988

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 28 PM 1:30
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Monuments EIS
Bureau of Land Management
California Desert District
1695 Spruce Street
Riverside, CA 92507

Re: Proposed Addition to Joshua Tree
National Monument Pinto Basin Parcel
(Parcel 5)

Dear Sirs:

In Chapter 1 of "The Monuments" Draft Environmental Impact Statement, dated July 1988, at Page 1-1, it is stated that, "[T]he purpose of the transfers is to modify the existing monument boundaries where adjustments would provide both more manageable borders, and borders that would not split ecological and topographic units." (Emphasis supplied.)

The document goes on to state that, "[P]arcels in which ownership is checkerboarded or covered extensively with mining claims were dropped from consideration due to the difficulty of managing this type of land pattern and the high cost of resolving the claims." (Emphasis supplied.)

From the foregoing statement of purpose we can only surmise that the "Eagle Mountains Alternative C", which would add 32,715 more acres to the Monument, in addition to the 4,480-acre Pinto Basin parcel (Parcel 5), must be a "stalking horse" for Parcel 5, for the alternative hardly conforms with the stated purpose.

Nevertheless, because of the sweeping nature of this alternative proposal, and at the risk of diluting our objections to the basic proposal to add Parcel 5 to the Monument, we emphasize the following as demonstrating the total inappropriateness of Alternative C:

1. The Draft EIS's own statements at Pages 3-80 through 3-82, regarding Geology-Energy-Minerals in the area.
2. As a matter of fact, following closure of Kaiser Steel's iron ore mining operations in late 1982, a geologic reconnaissance survey of the general area indicated numerous target areas for detailed precious metal evaluation. One such target has been studied in detail, revealing the existence of an open pit gold ore body at that site, while the remaining field-verifiable targets await detailed evaluation.

Turning to the basic proposal to add the 4,480-acre Pinto Basin parcel to the Monument (Parcel 5), many of the considerations referred to above are relevant to this proposal as well. As indicated above, the Kaiser Steel Eagle Mountain holdings will see a significant amount of development activity over future years, and it is not appropriate that additional land be added to the Monument in that immediate area. More specifically:

1. As the enclosed maps indicates, the nearest boundary of Kaiser Steel and Draco holdings lies in close proximity to Parcel 5, and mineral development of these holdings will adversely impact Monument values, and particularly wilderness, if the parcel is recommended as suitable for wilderness by the Park Service as indicated at Page 4-26. Therefore, it is not true, as indicated, that wilderness qualities would not be impaired. Furthermore, future minerals development so near to a wilderness unit of the Monument is likely to result in strenuous confrontations regarding the impacts of such development with respect to scenic, air quality, and noise considerations. 94-1 In view of the importance of mineral development to the locally depressed economy, such confrontations should not be encouraged by what would be a relatively unimportant addition to Monument values. Coupled with the BLM's already existing recommendation that Parcel 5 not be considered as suitable for wilderness designation (Page 4-26), addition of Parcel 5 to the Monument seems to have little inherent merit from an eco-system point of view.

2. At Page 4-26, it also is stated that there would be few impacts on mineral resources. This is not true. As mineral activity occurs in Kaiser Steel and Draco nearby areas, mineralized trends continuing into Parcel 5 well may be developed. Mineral development history is replete with discovery of additional reserves and ore bodies as mining progresses in original target areas.

3. The Park Service rationale for transfer of Parcel 5 includes, on Page 2-14 of the draft EIS, that the access road to Parcel 5 is already regularly patrolled by NPS staff and that "no additional staffing costs would be associated with the addition of this area to the monument".

   The access road to which the draft EIS refers is the Black Eagle Mine road. This road can be maintained merely by motorized vehicular use through the Monument to its existing boundary. Immediately east of that boundary, the mine road crosses a major drainage channel defined by a broad, deep wash which can only be maintained in a condition serviceable to motorized vehicles through the periodic use of earthmoving equipment. While the mine road does readily define a boundary of Parcel 5, the implication of the draft EIS that NPS has merely to travel farther along the mine road to gain access to and patrol the boundary of Parcel 5 is not true.

3. Of course, as indicated in the draft document, a portion of the area has been extensively disturbed by past Kaiser Steel mining operations.

4. Kaiser Steel recently finalized an agreement with Mine Reclamation Corporation for the use of the open pits in lands adjacent to the Alternative C proposal area as repositories for non-hazardous solid waste from the Los Angeles urban areas. The potential use of the pits for this purpose is viewed as a significant step toward solving the solid waste disposal crisis facing these areas, and if additional information is required in this respect, we will gladly make it available to you.

5. Because unrestricted access along existing routes to the open pits and to the waste rock dumps for recovery of cover material is required for the operation of a solid waste facility, the Alternative C proposal would adversely impact lengthy segments of the only access route to the Central Pit and Black Eagle Pit areas. Attached is an Eagle Mountain Property map showing the extent of the currently disturbed areas (the shaded areas), as well as routes of access. It is interesting to note in this regard that the draft EIS, at Page 2-23, describes the Alternative C area as being bounded on the northeast by the "Black Eagle Mine Jeep Trail". Gentlemen, this is a portion of the main and only practical haul road to the Central and Black Eagle Pits, covered by the 100-foot wide right-of-way grant noted at Page 3-77. 94-2

6. Recently, an exploration agreement and mining lease were finalized between Kaiser Steel and a joint venture of the Kewiet Mining Group and Draco Mines for the detailed geologic evaluation of the Kaiser Steel and Draco properties within the proposed Alternate C area, and for the mining of any precious metal ore bodies that might be delineated by that evaluation.

   The attached Pinto Basin, Calif., quadrangle illustrates the relationship between the boundary of Alternate C and the Kaiser and the Draco claim areas. Where the draft EIS states on Page 1-1, that "Parcels in which ownership is checkerboarded or covered extensively with mining were dropped from consideration..." and, on Page 3-80, that only approximately "800-1,000 acres of private land on patented mining claims." exist in the area, Kaiser holdings approximate 1,100 acres of patented mining claims and 1,300 acres of unpatented mining claims while Draco holdings total 2,400 acres of unpatented claims. Clearly, the area effected by Alternate C contains a high concentration of mining claims; "the difficulty in managing this type of land pattern and the high cost of resolving these claims", as stated again in Page 1-1, should be sufficient cause to reconsider the proposed boundaries of Alternative C.

Although we certainly have to prefer the basic proposal over Alternative C, as stated above, we do not want our strenuous objections to the latter as in any way diminishing our concerns regarding the former. While it might be surmised that we could "live" with the basic proposal, rather than face the consequences of the Alternative C boundary, or the boundary established by Senate Bill 7 for the area (which is the same boundary), this does not diminish our concerns regarding the basic proposal's potential impacts on mining development, all without apparent significant benefit to Monument values.

Your attention to our concerns is greatly appreciated.

Sincerely yours,

KAISER STEEL CORPORATION

Orlo J. Anderson
Manager - Eagle Mountain

OJA/pam

Enclosures

cc: G. A. Fawcett - Kaiser Steel Corporation
J. E. Good - Gresham, Varner, Savage, Nolan & Tilden
J. H. McCall - Mine Reclamation Corporation
Al McCandless - Congressman, 37th District
Ed Hastey - California State Director, BLM
Patricia (Corky) Larson - Supervisor, County of Riverside

2
Response

94-1 As long as the mining operation is outside the Monument and wilderness area, operations can be conducted with little or no basis for confrontation.

94-2 The description has been modified to reflect the nature of the road.

95

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RIVERSIDE, CA.

"This Land for All"

NATIONAL OUTDOOR COALITION
2990 GRACE LANE, SUITE A / COSTA MESA, CALIFORNIA 92626 / 714-751-6624

October 27, 1988

REPLY TO:
H. Marie Brashear
6192 Magnolia Suite D
Riverside, CA 92506

CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
Attention: MONUMENT EIS
1695 Spruce Street
Riverside, California 92507

RE: The Monuments Draft Environmental Impact Statement

INTRODUCTION:

After days of review of this document the National Outdoor Coalition, on behalf of the 350,000 individuals and families represented by member organizations, must support alternative "E".

95-1 The reasons for our support of alternative "E" are many. The first and most important is that **The Monuments Draft EIS** is not an "**EIS**". It does not select and evaluate a preferred alternative as required by NEPA.

To illustrate what it really does.......It takes an apple from one tree, an orange from another tree and a lemon from another tree and expects the reader to make a fruit punch. The document does not address what this combination of selections will mean to the overall environment. The document did not consider sufficient alternatives. The document contains assumptions which are arbitrary.....consequences without supporting argument or in conflict with other statements within the document, not supported by the analysis of the EIS and are flawed and/or arbitrary.

In summary, this flawed process leads to a result that does not pass any test or reasonableness and demonstrates an abuse of administrative discretion.

STATEMENT OF FACTS:

1.0 In 1988 Director of the National Parks System, William Mott requested the subject lands be transferred from the Bureau of Land Management to the National Park System as additional lands for Death Valley National Monument and Joshua Tree National Monument.

2.0 ARGUMENT

95-2 2.1 The EIS is not responsive to specific issues raised in the Scoping process. One of the specific issues was a review of all boundaries of the monuments. A more specific review of that area of DVNM within San Bernardino County was raised. The BLM ignored both the general issue and the specific issue and chose to look at one small area of deletion and several other configurations of additions.

95-3 2.2 The EIS failed entirely to evaluate the BLM's stated "preferred alternative" which was composed of bits and pieces of Alternatives A, B and D.

2.3 The EIS failed entirely to evaluate alternatives A, B, C, and D as entire entities. The BLM instead chose to evaluate segments within each of the proposals.

2.4 The EIS contains conflicting and flawed information and conclusions with respect to wildlife and plants. page 3-37 indicates the bighorn sheep population is in decline in the Funeral Mountains and DVNM. That the bighorn are in decline throughout Death Valley National Monument is not even denied by DVNM (see DVNM general management plan page 141) and yet bighorn are utilized as a reason for transferring management of evaluated lands to DVNM.

95-4 Page 1-7 of the draft EIS states that "Two BLM sensitive plants occur in the Pinto Basin parcel". On page 3-64 it is stated that one of the species is found "near the eastern boundary of the parcel...." with the other found "approximately 8 miles to the southeast of the parcel." Which is the true statement.

2.5 Information not relevant to the subject has been incorporated within the EIS in an attempt to bias results. The document provides a long discussion of blue tongue, a disease which is thought to be transmitted to bighorn sheep by cattle. No evidence of this disease being present on the two affected ranches is presented. The NOC has assurances that the disease is not known to be present in the Hunter Mountain allotment. The NOC has no information on the other allotment.

95-5 2.6 Economic consequences are not addressed by the EIS....not the cost or benefit to communities and counties.....not the cost or benefit to either BLM and the Park Service, and not the cost to validate mining claims and acquire those found valid. The EIS does not address the economic consequences which will occur from a "regulatory taking" on the small miner when Park Service regulations put them out of business.

2.7 Social consequences of the action are not addressed in terms of impact on neighboring communities in California and Nevada.

95-6 2.8 While the current number of visitor use days is not great, the EIS does not address where these people will go and the impact to be expected from the transfer of these activities

95-7 2.9 The EIS does not adequately answer questions raised by Native Americans concerning food gathering and religious practices.

95-8 2.10 The EIS does not address the issue of fire suppression and the differences between NPS and BLM management of the land.

95-9 2.11 The EIS does not adequately address either water or minerals. The EIS does not provide minerals information specific to each of the alternatives.

2.12 The EIS does not address the provision of new opportunities on BLM lands for those lost through the transfer of lands to the monument.

2.13 The EIS does not address the amelioration of route proliferation upon closure of routes at the boundary of the expanded monuments and the impact to the environment. The EIS does not address the probability of construction of new routes or connectors to existing routes to end this proliferation.

95-10 2.14 The EIS does not adequately address private property rights.

2.15 The EIS is written in a way so as to mislead and confuse the public making it impossible for an "informed public" to reach a conclusion.

CONCLUSION: The EIS does not provide one reason, which would justify the transfer of any lands to the NPS. We are told wildlife would benefit, plants would benefit, cultural sites would benefit, historic sites would benefit. Yet upon reading the EIS and doing further research the NOC finds that wildlife is in decline under the NPS. The artificial water sources put in by volunteers, Cal Fish and Game and the BLM would be allowed to deteriorate to uselessness. The plants in question are currently protected by BLM and under NPS rules should fences or other exclosures be destroyed they would not be replaced. The cultural and historic sites currently protected by BLM would be allowed to deteriorate through natural weathering in violation of the Historic Preservation Act which requires protection even against weathering.

The EIS is flawed and for this reason the NOC must support the "No Action Alternative.

The NOC recommends that if the BLM and Park Service are serious about considering this transfer that it be withdrawn for revision and correction and upon completion of a "real EIS," that this new effort be submitted for public review and comment.

Thank you for the opportunity to comment.

Sincerely,

H Marie Brashear

H. Marie Brashear,
President

cc: Donald Hodel, Secretary of the Interior
President Ronald Regan
Vice President George Bush
Senator Pete Wilson

Response

95-1 Please see page S-3, last paragraph.

95-2 Please see response to 2-1.

95-3 Each alternative is described, and the impact from the proposed transfer using the ten issues described on page S-2.

95-4 Please see response to 92-2.

95-5 Economic consequences where determinable and not speculative based on existing data are noted in the Geology-Energy-Minerals section for each alternative and parcel. The areas with large numbers of mining claims were dropped from transfer as in North Death Valley parcel, modified Pyramid Peak alternative and Modified Greenwater Valley alternative. Further the potential affect of wilderness status would be the same under either NPS or BLM management.

95-6 Please see response to 89-19.

95-7 Please see page 3-28 "Cultural Resource" section.

95-8 Please see page 2-18, item 5.

95-9 Each parcel and alternative has a Geology-Energy-Minerals section.

95-10 Private property is considered in the "Lands" section for each alternative were found; and the private lands would be subject to the same management by BLM if the area was designated as Wilderness.

96

Dear Sirs:

Please put this article on File as comments on the Monuments EIS.

Thank you,

Fred Johnson
Box 246
Tecopa, CA. 92389

American Borate Co. Geologist

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BUREAU OF LAND MANAGEMENT
1988 OCT 28 PM 1:31
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

97

10/25/88

To Whom It May Concern:

I am opposed to the proposed boundary adjustment involving Death Valley and Joshua Tree National Monuments and BLM lands.

I will send another letter addressing specific rationale that was listed in the Draft EIS.

Much of the information given in the Draft EIS was incomplete or inaccurate. I have done a lot of research on some of the rationale given to support the need for this exchange and have found that many of the reasons given are unsubstantiated.

Janice Allen
Lone Pine, CA. 93545

Box 21

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CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Oct. 24, 1988 **98**

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 28 PM 1:32
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

To whom it may concern

I am against the proposed land exchange of Hunter Mountain, located in Inyo County, between the Death Valley National Monument, and the Bureau of Land Management.

It is totally unnecessary. Hunter Mountain itself is separate geographically from the DVNM. The whole concept of DVNM is entirely different from Hunter Mountain.

Are we out to change the image of DVNM? People think of D.V. as a vast dry desert with lots of colored rocks, which in a national monument, you cant pick up. Hunter Mountain is not like that. It has tall sage brush, mountains, piñons etc. It should be given forest classification.

98-1 The water there is already tied up. It is owned by the Hunter family, as handed down in a 9th Circuit Court Decision. Case no 20093, dated Dec. 19, 1967. Are they just going to take it away? There is nothing about that in the EIS.

The area already gives pleasure to those seeking peace, quiet, solitude, country unspoiled by civilization. Nobody wants to have a Park Ranger come along and tell them to move, its not a designated area. Up till now the people who use Hunter Mountain for camping, trapping, mining, off roading, biking, rockhounding, photography, hiking, horseback riding, piñon gathering and livestock grazing to name a few have kept the country in its original state, or close to it; it has not been destroyed and at a minimal cost to taxpayers. If this becomes a park there goes our freedom to enjoy, as we know it now.

Page 2

The DVNM mentions the mountain sheep. In their management plan they dont really say how they'll manage the mountain sheep. The consensus of opinion that I get from various informed people is that if they don't do something about the mountain lion (protected) and it is the policy not to do anything about the mountain lion, mountain sheep wont be a problem because there wont be any. In fact the published report of July 1988 doesnt sound like the NPS has any plans to help the mountain sheeps in any way. It appears to me that they are only using the sheep as an excuse to get rid of the cattle. If this conclusion is in error, I would greatly appriciate someone showing me exactly where it is in error, and exactly what the DVNM or NPS intends to do to help the mountain sheep.

I see concern expressed for endangered wild flowers. I need to know what wildflowers are endangered and where they are supposed to be located. This information is not in the EIS.

The fact that I am personally affected by the removal of grazing would have you think I would be biased in favor of ~~grazing~~ GRAZING. I wasnt always in the cattle business, and before I was, I could see the merits of grazing cattle on public lands. I strongly believe in the Multiple Use Concept.

When is this continued expansion going to end? Is it the Government policy to continually squeeze out the little guy? That is what this land grab is doing and we the people dont like it. Sincerely, Joy Hunter

Hunter Ranch
Olancha, Calif. 93549

Response

98-1 See response to 64-1.

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2: 04
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

24 OCTOBER 1988

CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
ATTN: MONUMENTS EIS
1695 SPRUCE ST
RIVERSIDE, CA 92507

DEAR SIR

REF: DRAFT ENVIRONMENTAL IMPACT STATEMENT--THE MONUMENTS BOUNDARY ADJUSTMENTS: DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS

ALTERNATIVE A SHOULD BE THE PREFERRED ALTERNATIVE FOR THE 5 PARCELS SO THAT THE ECOSYTEMS OF DEATH VALLEY AND JOSHUA TREE NATIONAL MONUMENTS CAN BE BETTER PROTECTED.

SINCERELY YOURS

Harry E Wilson

HARRY E WILSON
2120 N CALLOW AVE
BREMERTON, WA 98312-2908

100

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2:04
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

UNIVERSITY OF ALASKA-FAIRBANKS
Fairbanks, Alaska 99775
Institute of Arctic Biology

20 October 1988

Mr. Gerald E. Hillier
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

RE: Monuments EIS

Dear Gerry:

Although I am on leave temporarily, from the Department of Fish and Game, I am compelled to comment on the MonumentsDEIS. I have read and evaluated that document, and urge BLM to adopt the No Action alternative, which would continue the status quo.

In general, the National Park Service record, with respect to wildlife management activities (and desert sheep management activities in particular) is poor. In contrast, the BLM record is very good. All indications are that mountain sheep populations continue to decline on NPS lands in California, while they continue to increase on BLM lands. I
do not believe that BLM's commitment to manage habitat for "sensitive"
100-1 species, to ensure that they do not decrease, is consistent with a transfer
of lands to NPS; in fact, I would suggest that it would be a violoation of
policy with respect to sensitive species management.

Additionally, I am very concerned about the loss of hunter opportunity which, concomitantly, would accompany the transfer of those lands. NPS policies preclude consumptive uses of wildlife resources, a policy which I find totally unacceptable, particularly when consumptive wildlife uses historically have been occurring on the land s under consideration. Hunter opportunity must receive at least the consideration that other multiple uses do in the decision process.

I urge BLM to select Alternative E, the No Action alternative, and maintain the public lands under consideration under their current management prescriptions. To transfer lands to NPS will be a great setback for mountain sheep in California, and for hunters (and others) who use those lands for numerous and diverse purposes.

Sincerely,

V Bleich

Vernon C. Bleich

Response

100-1 The BLM's commitment to sensitive species is derived from the goals of the Endangered Species Act; the NPS also operates under this law and has similar conservation policies, although the methods differ.

L.C. Haas
638 Swarthmore Ave.
Pacific Palisades, Ca. 90272
213 454 2361

Sept. 12, 1988

101

Statement by Lucien C. Haas
On the BLM Proposal to expand the boundary of
Joshua Tree National Monument

I am a member of the California Desert Protection League and the San Gorgonio Chapter of the Sierra Club "Adopt-a-Wilderness Area" program. The wilderness area I am studying is WSA 334, Eagle Mountain.

I support the Desert Protection Act, S.7, by Senator Alan Cranston, and its proposed expansion of boundaries for Joshua Tree National Monument in changing its status to a national park.

The BLM proposal to add 4480 acres of the Pinto Basin to the southeast border of the monument makes no sense at all, especially in light of your proposal for Alternative C which at least recognizes the natural boundaries of Joshua Tree National Monument in just one area.

Because of my experience with the Eagle Mountain area (WSA 334) I will confine my comments to your Pinto Basin proposal and Alternative C which would incorporate a large part--but not all--of the study area.

Clearly, the addition of WSA 334 and your proposed Pinto Basin area would make more sense than just the addition of 4000 acres to the Pinto Basin as you propose.

There is, of course, nothing wrong with adding your 4000 acres to the monument but the gesture appears to be irrelevant. For all practical purposes it already is a "natural" part of the monument and anyone driving or hiking the Black Eagle Mine Road through the monument and into your proposed Pinto Basin addition would never know what was "monument" and what was Pinto Basin addition. It is all of one piece.

So it is difficult to fathom BLM thinking in throwing this 4000-acre piece into the monument when you and the park service know that Alternative C would make far greater sense as a natural expansion of the park boundary and the wilderness area which it encompasses.

This is not an endorsement of Alternative C per se, although as indicated I certainly support it over your selection of adding 4000 acres to Pinto Basin.

It is impossible to analyze your Alt. C without a detailed examination of the boundaries and a similar explanation of the rationale. The eliminatiOn of Big Wash, for example, in effect cuts the WSA in half and removes one of the most important features, in fact, probably the most important feature. My guess is that you removed Big Wash because of the jeep trail but your correct designation as wilderness of the larges southern portion of your Alternative C will cut off the jeep trail, making it a dead end and not very useful for OHV users. Also, your decision excludes all of the petroglyphs in the Hayfield Spring wash area. This feature would be a good addition to the park.

The best part of your Alt. C is recognition of the continuity of the natural park boundaries and wilderness by the addition of wilderness to the eastern boundary of the park and extension of it through a good part of the Eagle Mountains, although I do believe your continuation should have included Big Wash which is an integral and inseparable part of this very beautiful high plateau and basin.

Finally, you leave unanswered the question of what happens to Big Wash and the surrounding country which is left blank on your Multiple Use Map 3-15. I would be interested in how this will be classified. Leaving the road open, inviting more intensive use of the area, could affect the sheep population which probably use the Big Wash in migrating to Buzzard Spring and to water sources around the Kaiser mine operations. There has been mention of a tortoise population in WSA 334. Where is that population located and will it be protected under Alt. C or any other classification you decide on for the area?

L.C. Haas

102

Defenders
OF WILDLIFE

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BUREAU OF LAND MANAGEMENT
1988 OCT 27 PM 2:04
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 25, 1988

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

RE: The Monuments Draft Environmental Impact Statement (DEIS).

Dear Friends:

Defenders of Wildlife submits this letter as our comments and recommendations on the above-referenced DEIS. Please consider our input, and include this letter in the appropriate public record.

At the outset, we support and urge BLM to fully implement its preferred alternative to transfer five parcels of BLM land, totalling 210,970 acres, to the National Park Service as additions to the Death Valley and Joshua Tree National Monuments. We also commend BLM for pursuing these transfers, albeit with some changes, as recommended by the National Park Service. We concur that these transfers will improve management and ecosystem protection.

However, these proposed transfers do not go far enough. We believe that there are many other exciting opportunities for BLM land transfers to these two National Monuments which were given short shift in the DEIS, including the rejected alternatives vis-a-vis Eureka, Saline, and Northern Panamint Valleys; Owlshead Mountains; and Coxcomb Mountains. We are disappointed that these alternatives did not receive bona fide consideration. In addition, where the DEIS concedes current adverse impacts on wildlife species (especially desert tortoise/OHV conflicts and bighorn/livestock disease transmission), BLM's preferred alternative does not substantially reduce or eliminate these impacts. For example, BLM should include transfer of all of the desert tortoise concentration area in its preferred alternative as described on page 4-28.

In summary, we support BLM's preferred alternative as far as it goes, but we wish it went considerably farther. Thank you very much for considering our views.

Sincerely,

Richard Spotts

Richard Spotts
California Representative
Defenders of Wildlife

CALIFORNIA OFFICE: 5604 ROSEDALE WAY, SACRAMENTO, CALIFORNIA 95822 • (916) 442-6386
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

103

SAN FRANCISCO BAY CHAPTER • SIERRA CLUB

ALAMEDA • CONTRA COSTA • MARIN • SAN FRANCISCO 6014 COLLEGE AVENUE, OAKLAND, CA 94618
BOOKSTORE: (415) 658-7470 OFFICE: (415) 653-6127 CONSERVATION: (415) 653-6127

October 24, 1988

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside,CA 92507

I am submitting these comments on the "Monuments" Draft Environmental Impact Statement recently released by the Bureau of Land Management on behalf of the Wilderness Subcommittee of the San Francisco Bay Chapter of the Sierra Club. There is considerable interest in the Bay Area regarding management of our public lands in the California desert, as more people come to realize the need to protect and preserve these public lands for all the people in California, now and in future. You may be aware that all the major Bay Area newspapers have endorsed Senator Cranston's Desert Protection Act, and the Counties of Santa Cruz and San Francisco have unanimously passed official resolutions endorsing the Cranston bill.

In light of this intense concern about what happens on our desert lands, your "boundary adjustment" proposal made this year was greeted with great interest here. There is much applause and commendation for the BLM's acknowledgement in this EIS that some of the public lands it administers are of park quality. We view this proposed transfer as a potentially excellent step in the right direction.

103-1 But, of course, a step only. It is clear to any careful observer that this proposal must be viewed as a first step only, incomplete in itself as it stands. As a first step, we commend it and urge your efforts forward; but it is impossible to look at it seriously as a complete proposal in itself. For example--the proposed boundaries are often drawn without discernable logic. There is a claim in the document that the reason for the transfers is for "ecological completeness"; but proposed boundaries follow meaningless lines, cross roads, divide mountains, etc. If ecologic rationale were indeed the reason, the Owlshead Mountains, at the very least, would have been included in the proposal. Secondly, the Greenwater Mountains are commonly considered a logical addition to Death Valley N.M. and of course should also have been included in even the most modest proposal for additions to Death Valley. You have also neglected to include vital parts of the Panamint Range, excellent candidates for transfer into the National Park System.

As for the proposed addition to Pinto Basin of Joshua Tree N.M.--one smiles to consider adding a mere 4,480 acres to Joshua Tree. BLM must clearly consider this is first step only - a token - a hint of reality. The scale of your proposal is otherwise pretty far off; you are asking an astronomer who is engrossed in the vast cloud of stars making up the Milky Way to forget it all and look at one star only. You cannot save a sand dune by preserving one grain of sand.

Most of the document displays an uncommonly hasty preparation. Scoping was held only last June, clearly without time for scoping comments to be incorporated into the draft plan. Scoping sessions requested that the DEIS address the boundaries proposed by the California Desert Protection Act; this was not done. That it is altogether too hurried--in this case we must say entirely too hasty!--is a definite defect of the EIS.

However, I wish to call attention to one excellent feature of the DEIS--the careful collection of information on the transmittal of disease between domestic and bighorn sheep. This kind of careful study is desirable for other problems too.

BLM seems to excuse the inadequacy of the present transfer proposal by claiming that the National Park Service wanted it this way; however, it is our understanding that the initiative for the proposed transfer comes from the Secretary of the Interior instead.

In order to gain credibility, the final document must reduce the inconsistencies in the DEIS as well the arbitrary nature of boundaries and call for adding to Joshua Tree and Death Valley not only those units which are sound for management reasons but those which belong in the National Park System because they are of National Park quality for scenic, archaeological, historical, scientific, and recreation reasons as well.

There is one excellent way for BLM to enable serious students of the desert to regard this DEIS as more than a frivolous and solely political document. We suggest that due to the hurried and inadequate nature of the EIS, BLM should withdraw it now in order to prepare, in its place, a thorough and complete EIS for all desirable transfers.

So, in summary: we approve the concept of transfers of certain BLM lands to the NPS; however, we disapprove of much of the process being used.

Sincerely,

Vicky Hoover

Vicky Hoover, Chair
Bay Chapter Wilderness Subcommittee and
Sierra Club Northern California Desert Task Force

Response

103-1 Please see response for 2-1 and 46-1.

104

BRISTLECONE • CHAPTER
CNPS

DEDICATED TO THE PRESERVATION
OF THE CALIFORNIA NATIVEFLORA

P.O. Box 330
Lone Pine CA, 93545

October 26, 1988

California Desert District, BLM
ATTN: Monument EIS
1695 Spruce Street
Riverside CA, 92507

These comments refer to the Draft Environmental Impact Statement for Boundary Adjustments to transfer lands from the Bureau of Land Management to the National Park Service Death Valley and Joshua Tree Monuments.

Further review of this document since your public hearing in Lone Pine on 9/27/88 confirms our previously stated position that we want to see the maximum acreage transferred to the National Park Service. We still favor Alternative 1, Parcels 1,2, and 4, and Alternatives C and D.

In addition, we would like to see the Pyramid Peak parcel extended easterly to the end of the range near Death Valley Junction.

Thank you for providing us with the opportunity to review this document.

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Respectfully,

Vincent Yoder

Vincent Yoder, Conservation Chair
Bristlecone Chapter
California Native Plant Society

105

DESERT
SURVIVORS

October 24, 1988

Gerald Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Re: National Monument Expansion

Dear Mr. Hillier:

Desert Survivors supports the proposed transfer of BLM lands to Death Valley and Joshua Tree National Monuments as a first step towards more comprehensive protection of the California Desert. While the proposed small transfer is worthwhile, we emphasize that it fails to redesignate much of the National Park-quality land in the Death Valley and Joshua Tree areas, and does not address such lands in the East Mojave. Only when Death Valley and Joshua Tree are upgraded to National Parks, and joined by a new Mojave National Park, as proposed in the California Desert Protection Acts introduced in the past two Congresses, will land transfers from BLM to NPS be temporarily complete. The proposed small-scale transfer is a beginning, but no more than that.

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Very Truly Yours,

Donald Falk
President

P.O. Box 20991, Oakland, CA 94620-0991
~~1717 Camino Verde - Walnut Creek, CA 94596~~

106

Oct. 24, 1988

To Whom It May Concern

Please enter my comments into the official record regarding the Monument EIS.

I support Alternative A, but with the following change:

All BLM lands designated for inclusion in S7, the Cranston desert bill, should be designated as national parks, national monuments, or otherwise, per that bill, to whatever extent possible without Congressional action.

Thank you for this opportunity to comment on this important matter.

Sincerely,

Rik Scarce

Rik Scarce
104 Amarillo Ave.
Palo Alto, CA 94303

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October 24,1988

Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Gentleman:

This letter is in response to the Draft Environmental Impact Statement for boundary adjustments of Death Valley and Joshua Tree National Monuments. After thoroughly reviewing the environmental document it is my position that the appropriate action is Alternative E:No Action. I support this alternative because I believe multiple use management by the BLM under the California Desert Plan is of the greatest benefit to all the people.

If after completion of the Environmental Impact Statement it appears that boundary adjustments are imminent, I would recommend that the Bureau's preferred alternative be adopted. Notwithstanding Alternative E:No Action, I believe the Bureau's preferred alternative to be the most responsible and beneficial of those considered.

Thankyou for allowing my comments on this important proposal for our California Desert.

Sincerely

Greg Pelka

Greg Pelka
5603 Pimenta Ave.
Lakewood,CA 90712

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CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Deserts District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507
ATTN: Monuments EIS

BLM: October 24, 1988

This letter concerns the proposed transfer of BLM land to the National Park Service. This proposal, it seems to me, is putting the cart before the horse. Yes, land should be transferred to Joshua Tree and Death Valley National Monuments, but the amounts are much too small! Also, they are not in keeping with the proposed Desert Protection Act, Senate Bill S-7 which, it is obvious, has prompted this action by the BLM. If the BLM supports NPS management of fragile areas, you should be supporting the Desert Bill and trying to push it through. Don't be sleazy!

This is a shoddy document, shameful in the extreme. Fast-tracking an EIS like this should not be done --- how much overtime are you paying to rush this through and get it to Reagan's desk before he keels over, instead of doing a thorough job?

To me, this only proves that the BLM is not serious when it comes to desert protection. I urge you to withdraw the transfer until after the Desert Bill is voted on by Congress.

Sincerely,

Steve Tabor

Steve Tabor
633 Post St. #672
San Francisco, CA 94109-8215

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10-25-88

CALIFORNIA DESERT DISTRICT
Bureau of Land Management
ATTN: MONUMENTS EIS
1695 Soruce Street
Riverside, California 92507

Dear Sirs

I have been working and exploring the entire Greenwater Parcel for precious and strategic minerals for many years. I am a 14 year resident of the Death Valley Area. I do not support any boundary revision to expand Death Valley National Monument because the mineral potential in many of the proposed areas is very good, and it has not been adequately explored by modern methods.

I have run over 200 assays in the Greenwater area , and have recognized some very significant trends for precious metals in the area. Some of these trends are outside but directly abutting the proposed boundary change, but the trend is into the proposed new National Park. I am working now,to get a company with sufficient capitol to drill this trend, as past drill holes intercepted zones with up to 0.1 oz./ton gold and 3 oz./ton silver with indications of cobalt mineralization.. I cannot and will not send you assays in the mail, but I will be glad to discuss the area with the B.L.M. geologist and point out areas of higher mineralization in both the northern and southern Greenwater areas. This area has all the earmarks of a shallow barite, gold, silver, and copper epithermal system that has overprinted a copper porphyry system.

Please do not recommend any of the Greenwater range or any of the other parcels for Monument inclusion. Support alternative "E" (NO Action) and multiple use on the Desert..

Thank you very much,

Frederic C. Johnson

Frederic C. Johnson

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THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGIONAL OFFICE

October 27, 1988

Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

RE: Draft EIS for Boundary Adjustments: Death Valley and Joshua Tree National Monuments, July 1988

Dear Mr. Hillier:

A recent poll conducted by the Field Institute for The Wilderness Society found that a majority of Californians want additional park lands in the California Desert. Within the 12.1 million acres of the California Desert Conservation Area managed by the Bureau of Land Management (BLM) there are natural resource values of such high quality and importance that their inclusion within the National Park System has been considered and proposed numerous times.

The BLM itself, during the development of the Desert Management Plan found that **"cultural and natural resource values of the East Mojave...are so diverse and outstanding that the area readily qualifies for National Park or Monument status."** The National Park Service (NPS) agreed, finding in 1987 that the area would be a worthy and valuable addition to the National Park System.

Many national resource lands adjacent to existing NPS units in the California Desert have also been recognized for their important natural values and proposed for addition to those units. As you know, the United States Congress currently has before it a proposal that includes both these additions and the Mojave Park.

116 NEW MONTGOMERY, SUITE 526, SAN FRANCISCO, CA 94105
(415) 541-9144

The Department of Interior (DOI) has recognized the appropriateness of transferring lands in the California Desert from the BLM to the NPS in this most recent initiative, The Monuments DEIS. We applaud the DOI in taking this first step towards securing fully adequate protection for all the desert areas that qualify for and deserve inclusion within the National Park System.

Attached are comments on the Draft Environmental Impact Statement for the proposed transfer. Please consider them and my statement presented at the Riverside hearing in development of the final EIS.

Sincerely,

Norbert Riedy

Norbert Riedy
Assistant Regional Director

Comments of The Wilderness Society
on the
Draft Environmental Impact Statement
For

Boundary Adjustments: Death Valley and Joshua Tree National Monuments

Objectivity of Analysis Lacking

The draft document lacks objectivity. Inadequate analysis, undocumented statements, and misrepresentations of NPS policies bias the reviewer against Park Service management. Examples will be outlined in various sections below.

110-1 Further, Table S-1, Summary of Impacts, is a subjective evaluation of alternatives which has no place in a professional analysis of impacts. Phrases such as "highly positive" used in Table S-1 are not objective terms. The Council on Environmental Quality regulations for environmental impact statements requires that "all reasonable alternatives" be "objectively evaluated". (Emphasis added; see CEQ Reg. at 1502.14(a))

Alternatives Analyzed are Inadequate

The alternatives considered failed to include the full breadth of proposals developed during the scoping sessions. Further, the justification presented at 2-26 and 2-27 for the decision not to consider certain alternatives is inadequate.

110-2 Public comment during the scoping process called for inclusion of an alternative that encompassed the California Desert Protection Act, which includes a proposal for transfer of the East Mojave National Scenic Area to the NPS. The DEIS fails to offer a rationale for excluding the transfer of the east mojave region from consideration. Previous NPS and BLM reports found this area to qualify for addition to the National Park System, yet it is not discussed in the document. The BLM itself has noted elsewhere the qualifications of the area for NPS protection: **"In all of the California Desert there is no finer grouping of different wildlife habitats than in the East Mojave, both from the viewpoint of the total number of species and the total number of animals. The Kelso Dunes, Granite, Providence, and New York Mountains, and the Cima Dome are the finest examples of their particular habitat types in California".** There are already two National Natural Landmarks in the area and the NPS has recommended creating eight additional ones. Cultural, wildlife and recreational values also abound within the area.

The Park Service, the Bureau of Land Management, the public, and members of Congress have all identified numerous resources and areas within the California Desert Conservation Area that qualify for addition to the National Park System beyond those considered in detail by the DEIS. The rationale for dropping these from detailed analysis is inadequate.

Based on criteria long established to evaluate areas proposed for addition to the National Park System, the NPS Western Regional office developed a report last year concerning areas left out from detailed analysis in the DEIS. The criteria used to evaluate the proposal included: 1. lands that hold both natural and cultural phenomena needed to complete the national park system; 2. National Natural Landmarks that have values of national significance, and; 3. lands necessary to provide a more complete ecological system for existing park units.

The 1987 study determined that the Saline/Eureka Valley area adjacent to Death Valley included significant resources and accounts for topographic features that provide logical boundaries from a resource management perspective, as well as, from an administrative point of view. The DEIS rejects consideration of this vast area and the contiguous Panamint Valley with one paragraph that itself is inaccurate and misleading.

The area is dismissed due to a possible need for additional staffing and infrastructure. This is a specious argument. The limited transfer analyzed in the DEIS would likely require increased staffing and infrastructure if implemented. In addition, the area wasn't considered because the lands are used by the military for low-level flights and is recommended for wilderness by BLM. Since military flight rules require the same minimum altitude over wilderness and park areas, this argument against inclusion of the areas in the transfer proposal is also specious.

110-3 The Monuments DEIS rejects consideration of the Pinto, Coxcomb, and Little San Bernardino Mountain areas contiguous to Joshua Tree National Monument for transfer without substantiated reasoning. They were recommended for addition to the Monument in the earlier Park Service report. The current boundaries along public land survey lines are difficult to manage and arbitrary. These additions, in large measure, would instead provide the park unit with topographic boundaries. Additionally, this larger proposal would add important wildlife habitat and ecological integrity.

Unsubstantiated Conclusions Concerning Bighorn Sheep

The discussion of the bighorn sheep within Death Valley and in parcels considered for transfer includes unsubstantiated conclusions on populations size and trends. Further, the analysis misrepresents NPS policy towards bighorn sheep and water development management leading to an inaccurate assessment of potential impact.

110-4 The conclusions reached in the document at 3-37 concerning population size of bighorn sheep in the Funeral Mountains and within the Monument as a whole are unsubstantiated. The estimates quoted were developed using different methods during different times of the years and thus any conclusions on trends represent mere speculation dependent on haphazard data collection.

In the event of uncertainty, the analysis presented should, as CEQ regulations state, "...always make clear that such information is lacking or that uncertainty exists." (CEQ regulations at 1502.22) The discussion on bighorn sheep population trends does not do this.

A review of information in Chapters III and IV indicate further misrepresentations and inaccuracies regarding NPS management polices. At 4-17 and 4-18 the DEIS concludes that under NPS management if "anything catastrophic happened to the Pyramid Peak bighorn guzzler it would not be repaired or replaced...would render a large area of bighorn habitat unusable, and ...would lead to further population declines."

110-5 First, NPS policy is to provide water, via a guzzler for example, if man's activities have caused the loss of a natural water source and natural water conditions cannot be restored. Stating that the Pyramid Peak guzzler would not be replaced is unsubstantiated. Maintenance and replacement of guzzlers upon which sheep herds have become dependent would also take place under NPS management. 110-6 Secondly, at 3-37 it is noted that "this guzzler is currently receiving low use." And, in fact according to a recent report (see Wilson in "Sheepherder", March 1988) the Pyramid Peak guzzler has not contained water for three summers due to broken pipe. Thus, the conclusion that Park Service management of the area would likely lead to "further population decline" is not supported by the few facts that are presented.

Assessment of Mineral Resources Misleading and Inaccurate

Various discussions, statements, and conclusions concerning mineral production and values are misleading or inaccurate. The analysis fails to address the basic uncertainties of mining and instead presents unsupported and undocumented reference to lost mineral benefits under NPS management.

For various reasons, including alternative deposits, remote location, and demand much of the mineral potential outlined will never be utilized even if the land remains under BLM jurisdiction. For example, the DEIS concludes that transfer of the Hunter Mt. parcel to NPS would "cause significant negative impact on future mineral exploration or development of the area." The document fails to point out that exploration over the last century and a half has not led to substantial mineral development in the area.

110-7 At 4-17, the discussion of Wallastonite on Hunter Mt. stresses the potential for production without noting that the remote location and related transportation costs have made the deposit unattractive to developers. In fact, nearby Pfizer Mining Company failed to develop a Wollastonite deposit close to their existing operations due to excessive production costs. 110-8 The reference to impacts to the Inyo County tax base from development of this deposit is unclear. What would the impact be?

110-9 Again at 4-17, the DEIS states "Of particular consequence is the potential loss of the strategic minerals copper, lead, silver, and zinc that have an identified potential for occurrence in the Hunter Mountain parcel." The DEIS fails to meet the requirements of objectivity outlined by the CEQ and noted above. First, there is no single definitive source that describes which materials are strategic or critical. According to the federal Office of Technology Assessment (OTA) none of the four minerals mentioned in the quote above are strategic materials. 110-10 Further, the statement at 4-17 is misleading in that "identified potential for occurrence" has little to do with potential for production. The reality of mineral economics, transportation costs, demand, etc, is not addressed, thus the statement that NPS would cause "significant negative impact" is unsubstantiated.

The DEIS fails to support or reference several conclusionary 110-11 statements attributed to "Johnson", see 3-55 and 3-61. In fact, our understanding is that the patented mining claims referred to by Johnson at 3-55 are not owned by the NPS. Thus, the veracity of all unsupported statements attributed to Johnson is questionable. The DEIS treats them as fact without supporting documentation.

Response

110-1 It is not suggested that such terms are by themselves objective but applied equally and consistently, there is derived a relative weighting that provides a means and basis for evaluation of resources.

110-2 Please see responses 2-1 and 46-1.

110-3 Please see response 46-1.

110-4 It is true that different methods were used in the three investigations cited. However, the methods were not haphazard, and population estimates were made. Although the accuracy of the estimates may vary and make comparisons difficult, no other data is available. This data does indicate a large, long-term decline which is contrary to the trends over the same span in many other herds where management facilities, such as guzzlers, have been constructed. Park Service policies discourage the construction and maintenance of such wildlife management facilities.

110-5 See Memorandum for the Record, Appendix G. Any guzzler situation entered into by the NPS would be evaluated on a case by case basis to determine whether the guzzler would be maintained and replaced after destruction by flood. The Pyramid Peak guzzler, or any guzzler inherited by the NPS, would be maintained and replaced, if need be, if it was determined that the guzzler had become a critical water source for bighorn or other native wildlife.

110-6 The Pyramid Peak guzzler was first operational in 1980. Based on records from semiannual inspections, in the nine years of operation the guzzler was probably dry in two summers (1982 and 1987). Based on pellet plot analysis use has been variable but light during the nine years of guzzler operation. Lamb use has been noted in some years. The level of use indicates that few sheep, if any, are dependent on his water source at this time. This may be a reflection of the continuing, long-term decline in bighorn numbers in this range. The effects of abandonment of the guzzler on population size are unknown.

110-7 The reasons for lack of development of the wollastonite property on Hunter Mountain is a matter of speculation. The remoteness of the deposit and the high transportation costs may contribute. Of equal concern, as expressed by the management of HYCO, the leading U.S. wollastonite producer, is the perceived unreasonable environmental demands that may be placed on an operation located on Hunter Mountain.

110-8 The exact revenue loss to Inyo County can only be estimated, but we can calculate an estimate loss with the following assumptions: 1) the operation is viable; 2) proven reserves are 2 million st; 3) operation will last 10 years. A range of value can be obtained from "Industrial Minerals" (see April 1988 issue for range of $92-137.00 per st for wollastonite). Simple multiplication will derive gross worth. The Inyo County tax rate, sales tax returned to County can be use to derive a gross estimate.

110-9 The Bureau of Mines identified (1987) copper, lead, silver and zinc as strategic and critical minerals. In addition, the BOM also noted a net import reliance of 50% or more for silver and zinc.

110-10 The standard adopted by the Bureau of Land Management 3030 manual, "Energy and Mineral Resource Assessment" and the US Geological Survey in evaluating lands under wilderness review, has been one of potential for occurrence. The standard does not take into account potential for development or production.

110-11 Ownership of some of the patented claims by NPS is shown on Inyo County Assessors maps according to Rich White of that office. The statement on 3-61 has been modified to show that it represents the opinion of Fred Johnson.

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To whom it may concern,

I have only recently received the Draft EIS known as "The Monuments". As this document is so obviously a transparent, illconceived, and flagrant attempt to cover your rear from the "California Desert Protection Act", I will make my comments very few. I find it interesting that this EIS process was so Hasteyly (sic) conceived and bore fruit in less time than it normally takes the BLM to write an AMP-see what can be done when your power base is threatened. The CDCA Plan has been in the process for some twelve years and it took a whole five months to come up with this plum. As this represents nothing more than a rehash of your previously inadequate environmental documentation it shouldn't suprise me that the present EIS took form in such record time. Don't get me wrong I think turning over lands to the NPS is a wonderful idea maybe, just maybe, they can institute some form of an ecosystem approach. What I would suggest is a buffer zone of total wilderness or turn the entire thing over to the NPS. It is blatantly apparent that the BLM will play politics with any and all land management decisions. I am fully aware that politics creep into all resource agencies and none are exempt, but to force your generally conscientious and down right likable field personnel to have to grovel before the petty Sacto/Washington bureaucrats, it's disgusting. In this election year your EIS has about as much substance as one of our candidates speeches. Crawl before your politicos if you must but keep their tainted hands, their fouled and soiled souls the hell out of Death Valley.

PS. I see Patsy Clark has returned to Inyo County. Some of your local yokel geologists should have spent more hours studing their history lessons. Or maybe they have figured a way to peddle stock on the New York Curb. Did someone really think cattle were indiginous (sic) to Death Valley or did you just make that up. Viva Pangaea.

Please keep me abreast of all future and on going EA's, EIS's, etc. concerning the CDCA.

Sincerely,

Rod Mondt

Rod Mondt

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MONDT / ZIERENBERG
2853 W. Ajo Way, #1
Tucson, AZ 85746

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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF TRANSPORTATION
DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CA 92402
TDD (714) 383-4609

October 25, 1988 Riv-62-Various

Mr. Gerald Hiller
California Desert District
U.S. Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hiller:

We have reviewed a Draft Environmental Impact Statement for The Monuments Boundary Adjustment and have no comment at this time.

If you have any questions, please contact Richard Malacoff at (714) 383-4550.

Very truly yours,

G. G. Visbal

GUY G. VISBAL
Chief, Transportation Planning

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Sierra Club Southern California Regional Conservation Committee

Southern California Sierra Club Desert Committee
4134 Ocean View Blvd., Montrose, CA 91020

OCTOBER 24, 1988

California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier,

The Sierra Club 's Desert Committee is submitting the following comments on the Draft Environmental Impact Statement on the "Monuments" transfer of some BLM lands to the National Park Service through the Desert Plan Amendment process. Other Sierra Club committees may also be submitting comments.

The comments are organized as follows:
1) General comments on the transfer;
2) Comments on the process;
3) Comments on the adequacy of the document.

General Comments on the Transfer of Desert Lands from the BLM to the National Park Service

Obviously the Sierra Club thinks that the proposed lands belong within the National Park System, since the Sierra Club adopted a position several years ago supporting the California Desert Protection Act, and that legislative measure would also transfer these lands to the National Park Service.

113-1 However, the Sierra Club feels that the boundaries selected in this case were ill conceived, and do not meet even the BLM's weak set of criteria - manageability and not splitting ecological and topographic units - which were supposed to govern selection of units and boundaries.

When the Sierra Club adopted its position on proposed new boundaries, it considered future needs, ecological, biological, scenic, recreation, geologic, historic, and suitability values as well as manageability of the lands it felt qualified for designation as part of the National Park System. It then added to these a concern about threats and losses of these values to competing values under the BLM's interpretation and implementation of its multiple use management mandate.

Thus, in the whole, we find the proposed transfers to be grossly inadequate to protect the valuable national park quality lands in the desert. We also especially find them lacking in consistency with the report of the President's Commission on Americans Outdoors, a report which emphasized the need for the types of facilities and opportunities provided by the National Park Service.

Comments on the Process

113-2 Twice in the opening pages of the draft document we are asked to accept this document as a Desert Plan Amendment. We do not accept that assertion. The process employed for this proposal is not consistent with that used for other Desert Plan Amendments.

This proposed transfer violates the standards established by BLM for plan amendments on several grounds:

a) The public, although invited in previous years to submit proposed plan amendments, was not allowed to have its proposals for transfers to the NPS seriously considered with other amendments.

b) This proposal was not submitted to review by the Desert District Advisory Council, with the advisory council able to hear the pro and con arguments.

c) The transfers do not meet the criteria for consideration as a plan amendment that were imposed on all suggestions in the past: new information requiring a change in existing policy or correction of errors.

d) BLM staff was not given time to prepare a complete document addressing all of the issues raised during the scoping of this proposed transfer.

e) No justification for special treatment exists. Why wasn't the "park service proposal for transfer" included with every other proposal for amendment? Other agencies have proposed changes and have not been given preferential treatment. A change involving lands managed by the Navy in Imperial County was at least as complicated and was considered with other plan amendments as part of the regular cycle.

113-3 Second, to put it charitably, omitting disclosure of several steps which led to this proposal appears to be a deliberate attempt to mislead the public. The impression is left that local NPS units initiated this process and that the BLM is acceding to their wishes after some negotiations. In fact, the exact opposite is true. A check of meetings between monument personnel and BLM personnel reveals that BLM initiated the process and made demands on the NPS in exchange for "allowing" the transfer, such as giving up some existing monument lands in exchange for others.

113-4 Third, given that the staff at Death Valley and Joshua Tree actually did submit a list of areas they were interested in, the BLM has kept from the public the true extent of the NPS requests. Not all of the areas they requested are even recognized on the "rejected" list. National Park Service rationale for each unit are not available for the public to review.

113-5 Fourth, in previous years many plan amendments submitted by the public were rejected from consideration because the BLM did not wish to "reopen" discussion on a topic "settled" by the Desert Plan, including the topic of national park transfers. The administrative designation of the East Mojave National Scenic Area was BLM's answer. If the topic is now open, then it deserves a full airing, with many other alternatives considered, as requested by the public at EVERY ONE of the scoping sessions held on this DEIS.

Fifth, the scoping process was fraudulent. Decisions concerning which issues and alternatives would be addressed were already made before the scoping sessions were held. Many issues raised by the public were dismissed not because they were invalid or inappropriate or of low importance but because addressing them adequately would have required staff time following the scoping sessions -- time that was not allowed. Staff was expected to submit its material almost literally within hours of the closing of the final scoping session. How often, since the Desert Plan was adopted, has a draft environmental assessment been completed within two months of the announcement of intention to prepare the document? Usually plan amendment DEIS's take at least 18 months. Many desert DEISs have taken a full year between draft and final.

At scoping sessions conducted by BLM in June, participants were allowed to bash national park management and vilify the California Desert Protection Act in spite of stated ground rules to the contrary and in spite of protests of members of the public to have the hearing officers keep people on topic.

113-6 At scoping sessions, environmentalists asked for consideration of all of the expansions proposed in S. 7, and H.R. 371, the California Desert Protection Act, and specifically pointed out inconsistencies with the avowed ecological and management bases for the proposed transfers.

113-7 The exact nature of the proposed transfer was a moving target. Maps distributed at various times have shown smaller and smaller transfer proposals, especially around Joshua Tree. The public was left confused at the scoping sessions. It seemed that the BLM had the right to reduce what was to be considered but neither the NPS nor the public had the right to expand the proposals.

113-8 Sixth, given the extremely short turn-around time on this DEIS, one would think that the BLM would have relied on documents previously prepared, or research by the scientific community.

Instead we find "original" characterizations of areas which bear little resemblance to the material which appears in the appendices to the Desert Plan.

For these reasons we find the process to be a fraud and a farce which commits mayhem on the credibility of the plan amendment cycle process. From our perspective it appears that the BLM motivation in pushing the transfer to save face, divert attention from the California Desert Protection Act, and corner and embarrass the Western Regional Office of the National Park Service into withdrawing its glowing praise of changes proposed by the California Desert Protection Act.

The quid pro quo for this transfer was an immediate statement from the National Park Service that it is no longer interested in the other lands proposed for transfer in S.7 and H.R. 371. This release by the park service reveals the real political nature of this proposal, which has nothing to do with better management or ecological or topographic boundaries.

In contrast, the California Desert Protection Act would transfer more acres to Joshua Tree than the entire monuments proposal, and would add about 1.3 MILLION acres to Death Valley, in addition to creating a new 1.5 MILLION acre national park in the East Mojave.

To the BLM's credit, buried in the document are some good reasons for moving rapidly on the desert bill. Threats to some of the resources, primarily bighorn sheep, are well documented, although the analysis of the situation on the east side of Death Valley is very unprofessional and unwarranted extrapolations have led to erroneous conclusions. Threats to resources around the monuments are typical of those found in other areas of the desert.

The Inadequacy of the Environmental Assessment.

We find the document to be inadequate since it fails to include all relevant information, it distorts information, and draws inappropriate conclusions which are not supported by the facts. In other cases relevant information is applied selectively. For example, the implications of recent scientific documentation of the transfer of disease between cattle and bighorn sheep seems to have been considered only in one of the units proposed for transfer around Death Valley and ignored elsewhere although there are bighorn sheep and cattle problems in other units. 113-9

113-10 The DEIS omits discussion of BLM's attitude and management actions taken on the issue of cattle trespass and that in spite of repeated complaints by DVNM, BLM has done nothing to control trespass into the monument. On some park boundaries the NPS has been forced into the expensive proposition of fencing its border to halt the trespass. The environmental impact of the probable need to fence additional borders to eliminate cattle is not included.

The Sierra Club finds it curious, in the glow of the lightening speed of this DEIS, that though the Sand Spring ACEC was designated in 1983, no plan was prepared for the Big Sand Springs (about 500 acres) in the intervening 5 years. The DEIS says that the "ACEC management plan for Big and Little Sand Springs has yet to be completed, although most of the planned actions have been implemented." Any wonder that the public complains? For rhetorical purposes one might ask how BLM found the money to evaluate a 210,000 acre transfer DEIS but not for an ACEC plan. Clearly the absence of the ACEC management plans renders this DEIS inadequate since the public cannot adequately assess the relative merits of the BLM vs. NPS management alternatives in the absence of information on what the BLM would do.

While touting better management and ecological boundaries as rationale for the changes, the transfers splits many topographic and ecological units. It fails to consider the top of the Panamint Range where the NPS is in a better position to manage the entire pinyon pine ecosystem on the top of the range as a unit. Likewise it fails to consider the strip of the Panamint Range south of Goler Wash between the monument and the Naval Weapons Center, an isolated unit which BLM fails to patrol. The boundary north of Death Valley stops at Crankshaft Junction and fails to include all of the drainage into Death Valley from the north. Especially vulnerable are springs north of the junction. 113-11

The isolated BLM Owlshead Mountains Wilderness Study Area was recommended for wilderness in its entirety by BLM, a unit with NPS land on the north and east and military land on the south and west. It is another area that BLM seldom patrols, and one which would be simpler to manage under NPS management. Ecologically it also falls within Death Valley. According to Death Valley Park personnel this was their HIGHEST priority for transfer. That fact is omitted from the DEIS. BLM dismisses the tract from consideration because it "offers no further enhancement to the monument" as though BLM knows better than the NPS about what would enhance the monument.

113-12 BLM staff have privately acknowledged that the reason for rejection is that its transfer might interfere with a working relationship with the military. Does this mean that the NPS boundaries are not determined by the nature of the resource but are being held hostage to the working relationship between the BLM and the Department of Defense?

113-13 The Joshua Tree proposal omits consideration of a Coxcomb Mountain unit though the western part of the mountains are in the monument and BLM doesn't patrol the eastern part of the complex range. The current boundary splits the ecological unit.

The failure to consider a southwestern expansion into the Little San Bernardino Mountains is another case which demonstrates that the BLM had a hidden agenda when this document was prepared. The Park Service has had much vehicle trespass into its wilderness areas by people driving up the canyons. The NPS has tried various measure to stop or limit this trespass. Control of the mouths of the canyons by the NPS could alleviate this problem. Once again, this area was reportedly high on the monument request list, a fact omitted in the DEIS.

113-14 The area's checkerboard ownership is not sufficient rationale for dismissal from consideration, since the NPS has already successfully managed checkerboard lands in the monument. The excuse that it is unmanageable is isupportable, since the NPS has the option of gradually acquiring the lands. Instead the NPS has been left to fend for itself with no help from BLM. There is an attempted inference that BLM can do a better job at managing checkerboard lands than the NPS, even though the past BLM management has led to the current untenable management situation.

113-15 In spite of detailing the threats to Bighorn Sheep and deer by diseases carried by cattle, the transfer would not allow the Park Service to terminate the cattle grazing in the North Death Valley and Hunter Mountain units. In the Desert Plan the BLM pledged to reduce or eliminate cattle grazing if it was found that cattle do transfer diseases to Bighorn Sheep. Now that the scientific evidence is in, BLM is making no moves in that direction. 113-16 The DEIS claims that the transfers would threaten the "viability" of the existing grazing leases. Does the multiple use management mandate of the BLM mean that the viability of a small commercial exploitation is more important than protecting the populations of bighorn sheep? The State of California has spent hundreds of thousands of dollars protecting the sheep and trying to re-establish populations even in nearby areas. These small grazing operations could undermine and render the efforts wasted.

Thus we find this document inadequate in that it fails to consider a full range of alternatives to address the problems which allegedly formed the basis for the NPS request.

113-17 The document misleads the public in its exposition of the situation with regard to mining claims. Just since the introduction of the desert legislation a well known borate company has filed a large number of mining claims in the North Death Valley Area where there are no known reserves of borates or any other mineral of interest to the company. They appear to have been filed more to harass and maneuver the NPS and BLM than to extract minerals from a known deposit. The DEIS points out the threat to water at Big Sand Spring as a result of appropriation to operate a millsite claim, should the claims be developed. 113-18 The DEIS disguises the sequence and attempts to minimize the impact of the claims by saying that "a number of" the claims were in existence prior to 1976.

Threats to Bighorn Sheep and water appropriation for mining are two of the best reasons for pursuing the transfer at this time and why the California Desert Protection league is pushing legislation. For the same reason that it is timely to do these small transfers it is timely to do the entire desert bill and to add to Joshua Tree and Death Valley, not only those units which are sound for management and ecological reasons but those which belong in the National Park System because they are of National Park quality for scenic and recreation reasons as well.

In conclusion, we find the document to be inadequate in that it does not consider a range of alternatives, it omits discussion of many issues which are relevant and important, contains false and misleading information, draws inappropriate conclusions, and omits much relevant information important to the decision being considered.

The Sierra Club feels compelled to point out that the end does not justify the means. We support the end, ie, that these lands would hereafter be managed by the National Park Service, but we do not support the means, which denies the truth, equal rights, fairness and justice which are an integral part of the environmental impact process -- a process designed to improve the information available to decision makers BEFORE they decide, not a process to justify a decision already made.

Sincerely,

Judy Anderson

Judith A. Anderson
Committee Chair

JA:ts
cc: Sen. Cranston, Wilson, Johnston, Bumpers, Metzenbaum, Fowler, Wirth, Lt. Gov. McCarthy
Cong. Levine, Lehman, Lewis, Hunter, McCandless, Thomas, Anderson, Badham, Bates, Beilenson, Berman, Bosco, Boxer, Brown, Coelho, Dannemeyer, Dellums, Dixon, Dornan, Dreier, Edwards, Fazio, Gallegly, Hawkins, Herger, Konnyu, Lagomarsino, Lantos, Lowery, Lungren, Martinez, Matsui, Miller, Mineta, Moorhead, Packard, Panetta, Pashayan, Roybal, Shumway, Stark, Torres, Waxman
Sup. Joyner
Riverside Press-Enterprise, San Bernardino Sun, Los Angeles Times
San Diego Union, San Francisco Examiner
Death Valley National Monument, Joshua Tree National Monument
Wm. Penn Mott, H. Chapman

Response

113-1 Please see response 46-1.

113-2 Please see response 87-9.

113-3 The Western Regional Office of the National Park Service filed the proposal not the "local unit" and consultation prior to filing, during and after filing an application is a customary procedure. Giving up Monument land was not considered.

113-4 All areas noted in the Western Regional letter of May 19, 1988, are considered and examined; none were left out.

113-5 The proposal was not filed as a plan amendment.

113-6 Please see response to 46-1.

113-7 The only instances of reduction that we are aware resulted from xerox of maps hand out for information.

113-8 Please see Appendix D containing literature cited.

113-9 There are no cattle or grazing allotments on Pinto Basin, Greenwater Valley, Pyramid Peak and for North Death Valley see page 3-6 regarding cattle and page 3-2 regarding bighorn sheep.

113-10 The need to fence the DVNM boundary in the Hunter Mountain area was discussed with the NPS at the time the other boundary fencing was being planned. At that time the NPS staff felt that the small impact caused by the cattle did not justify fencing. The issue is still under consideration.

113-11 Please see response 46-1

113-12 The response is no.

113-13 Although the Coxcomb Mountain unit was not proposed by the National Park Service's Western Regional Office, its inclusion was discussed but dismissed. As mentioned on page 2-31, much of the area is already recommended suitable for wilderness. This and the fact that both the Bureau and Park Service felt the unit could be more effectively managed by the BLM's Palm Springs/South Coast Resource Area, precluded it from further consideration.

113-14 These checkerboard lands would not be surrounded by NPS land but circumscribed by a freeway, roads and private lands, making manageability very difficult.

113-15 The Desert Plan does not direct elimination of cattle grazing in bighorn sheep habitat. The Plan states that "allotments South of I-40 shall be managed to maximize sheep populations". In other bighorn habitats, sheep populations are to be managed to maintain, and where possible, improve bighorn populations. Owing to the wild nature of bighorn sheep, it is difficult to manage their populations; however, cattle grazing can be managed. To this end the Desert Plan states "When bighorn sheep and livestock conflicts are identified, Allotment Management Plans (AMPs) will be developed with the specific objective of maintaining or improving bighorn numbers".

113-16 This cattle operation has coexisted with the bighorn sheep in the Hunter Mountain area since before the turn of the century. In this area, transmission of diseases between cattle and bighorn sheep is unknown. It is unknown whether cattle have been infected or are infected by any diseases that potentially could spread to the Hunter Mountain bighorn sheep population.

113-17 The section on leases and mining claims is a summary of the BLM mining claim record (April 12, 1988 version). On March 29, 1987, U.S. Borax filed seven mining claims in North Death Valley. After the filing, U.S. Borax conducted an exploration drilling program on the mining claims.

113-18 Two district claim grouping were identified from the records search, a relatively older grouping located near the Crater Mine area and a younger group located near the Little Sand Spring. The statement is specific that "a number of these (older claims located near the Crater line) were located prior to 1976." The older Crater Mine claim group, including the pre-1976 claims, are not related to the millsite at Little Sand Spring or the relatively younger exploratory claims located by U.S. Borax.

114

CALIFORNIA CATTLEMEN'S ASSOCIATION

JIM TIMMONS
PRESIDENT
ARCATA

MYRON OPENSHAW
1ST VICE PRESIDENT
OROVILLE

JOHN W. ROSS
EXECUTIVE VICE PRESIDENT

GEORGE SCOVEL
TREASURER
GILROY

CCA

TELEPHONE 444-0845 (AREA CODE 916)
1221 H STREET
SACRAMENTO, CALIFORNIA
ZIP CODE 95814

VICE PRESIDENTS

JACK SPARROWK
CLEMENTS

WARREN WAYLAND
SALINAS

WM. B. "WILLY" CHAMBERLIN
LOS OLIVOS

NCA
NATIONAL CATTLEMEN'S ASSOCIATION

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 NOV -2 PM 12:03
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

October 27, 1988

Gerald E. Hillier
California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier:

We are writing in reference to the "Draft EIS for Boundary Adjustments: Death Valley and Joshua Tree National Monuments." We are particularly concerned with the BLM's preferred alternative (Alternative A) to transfer the Hunter Mountain allotment to the National Park Service (NPS). This alternative will directly impact the livelihood of one of our members, Mr. Roy Hunter, whose family has run cattle on Hunter Mountain for over 100 years.

114-1 First, we understand that your office and Mr. Hunter reached agreement last April on an allotment management plan (AMP) for Hunter Mountain. During development of the AMP, Mr. Hunter was not made aware that his allotment was being considered for inclusion in the Death Valley National Monument, even though BLM and NPS has apparently been discussing this boundary adjustment since last fall. Was Mr. Hunter intentionally excluded from early discussions on a proposal to transfer his allotment to the NPS?

114-2 Second, there appears to be some misunderstanding between your office and the state BLM office. The Hunter Mountain allotment is a primary source of water and forage for Mr. Hunter to sustain a viable ranching operation. However, the state BLM office has indicated to us it is their understanding Mr. Hunter has not utilized much of the water and forage sources for several years. We believe you should clear up this discrepancy with the state office to alleviate doubts over Mr. Hunter's use of the allotment.

Now to some specific and some subjective points in the AMP and the EIS which fail to substantiate why the BLM is endorsing elimination of cattle grazing from Hunter Mountain:

114-3 1. Wildlife: On page 3-20 of the EIS, it states, "The current bighorn population is likely depressed due to habitat deterioration resulting from excessive grazing by wild horses and burros (and, to a lesser extent, cattle) as well as the presence of burros, horses and cattle in some of the key habitat areas." We realize that an excessive number of burros can compete with cattle for the resource, but why lump cattle into what is termed habitat deterioration when their numbers are limited to BLM authorization?

The EIS goes into detail on viral disease transmission from cattle to bighorn and deer and states, on page 3-22, that "if cattle were removed it is likely that bluetongue and epizootic hemorrhagic disease viruses would disappear from the (bighorn) population"; and on page 4-12, "Eventual removal of cattle from the parcel may enhance conditions for mule deer."

114-4 What is the evidence to support the above claims that cattle grazing is responsible for decreases in various species of wildlife? It is clearly stated at the bottom of page 3-22 that, "The effect of . . . diseases on the bighorn population in the Hunter Mountain area is unknown."

114-5 2. Predators: The EIS does not provide data concerning the impact of predators such as mountain lions, coyotes, bobcats and golden eagle on various wildlife populations.

114-6 3. Range Condition: On page 3-27 of the EIS it states, "At present, there is an upward trend in (range) condition"; on page 4-35 it states, "Because burros . . would continue to be removed from the parcel, the current low utilization rates would continue, resulting in an upward trend in vegetation condition"; and on page 11 of the AMP it states, "Current indicators show an upward trend in range condition." If the range is improving, what is the problem with continued livestock grazing? Why isn't livestock grazing recognized as a benefit to range improvement?

The EIS is filled with subjective statements like those above. Alternative A in the EIS presumes that problems over wildlife and other habitat enhancement exist due to grazing, but without evidence of those problems, especially from a multiple resource management perspective. The NPS mission states "Economic activities such as livestock grazing . . . are generally not consistent with preservation of park values or restoration of natural conditions. Where such uses are authorized, they must be closely controlled to ensure that resource values are not permanently impaired." According to this statement (see page 1-6 of EIS), livestock grazing could continue on the Hunter Mountain Allotment through permittee/agency cooperation. We believe the BLM must justify its endorsement of total elimination of cattle on the Hunter Mountain allotment over other management alternatives.

We would urge that the BLM endorse Alternative E to allow continued cattle grazing on the Hunter Mountain allotment. The AMP called for in this alternative provides the mechanism to address resource conflicts through prescriptive measures developed with assistance from affected resource users.

We appreciate this opportunity to comment. If you have questions, please feel free to call either of us at the CCA office.

Sincerely,

John W. Ross
John W. Ross
Executive Vice President

Sheila Massey
Sheila Massey, Director
Regulatory Affairs

Response

114-1 An agreement was reached during an advisory board tour on the allotment in April. The BLM California State Office had, at that time, been discussing possible boundary adjustments with the NPS in the CDCA. Those discussions were in general terms at that time. The consideration of the transfer of the Hunter Mountain parcel did not come up until the NPS proposed it approximately a month later.

114-2 As the EIS indicates, Roy Hunter grazes cattle in the parcel proposed for transfer. The BLM state office has been briefed about this.

114-3 Cattle were included in the grazing animals that are likely causing habitat deterioration because they are exotic (as are horses and burros), and have been in the affected area for a considerable period of time. Habitat deterioration can take many forms, including depletion of key forage species, pollution of water sources and presence of stress-causing animals. Due to the remote nature of much of the Hunter Mountain Allotment and the impossibility of easily controlling the movements and use of many parts of the allotment by cattle, it is possible that cattle, as well as horses and burros, are causing undesirable habitat conditions for bighorn and deer. For example, some cattle have remained in the lower portion of Grapevine Canyon beyond the close of the livestock grazing season because the rancher couldn't detect they were there from the road. Cattle are also known to drift into Death Valley National Monument from Hunter Mountain, especially into Cottonwood Canyon.
The BLM and National Park Service have been highly successful in removing horses and burros from the Hunter Mountain Area both inside and outside the National Monument. BLM has limited the number of cattle in the allotment but, in the absence of an Allotment Management Plan, has not determined what restrictions should be made to protect sensitive resource values. At the present time, cattle use in the area is restricted only by topography and water distribution.

114-4 Evidence that cattle are responsible for decreases in deer and bighorn in the affected area is hypothetical. The presence of serum antibodies in bighorn blood samples from the affected area for diseases common to domestic livestock is significant. The discussion and literature cited on page 3-22 provides evidence for suspecting that the presence of livestock disease agents could be suppressing the bighorn and deer population in the affected area. An additional reference is: J. Wehausen, et al. 1987. "Recruitment dynamics in a southern California mountain sheep population". Journal. Wild. Manage., Vol. 51, No. 1, pp. 86-98. In this article, the authors identified that bighorn lambs, and therefore recruitment of new individuals into the population, are probably most affected by two diseases common to domestic livestock, bluetongue and epizootic hemorrhagic disease.

114-5 The impact of natural predation on wildlife populations in the affected area was not addressed because it is a natural process and not affected by the proposed action and alternatives.

114-6 Range condition is one of a number of factors that cattle can affect. Range condition still needs to improve on the allotment to reach the goals in the California Desert Conservation Area Plan. In addition, there are a number of other potential impacts addressed (see chapter 3 and 4).

115

MAY 9, 1893

RECEIVED
BUREAU OF LAND MANAGEMENT
1988 NOV -8 AM 4:44
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

County Administrative Office

November 4, 1988

Mr. Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
ATTN: Monuments EIS
1695 Spruce Street
Riverside, California 92507

Dear Gerry:

The County of Riverside has reviewed the draft Environmental Impact Statement entitled "The Monuments." Please accept these comments on the proposed EIS.

Riverside County is opposed to the addition of portions of the Eagle Mountains to Joshua Tree National Monument. This proposal is labeled as "Alternative C: Eagle Mountains" on page 2-23 of the EIS, and it is shown on map 2-7 on page 2-24. At the present time, and for the foreseeable future, there are viable mining and commercial activities being undertaken in the proposed area. Therefore, it would be inappropriate to include this area in your expansion.

Please feel free to contact me if there is additional information you need regarding our opposition to the Eagle Mountain Alternative.

Sincerely,

Gary N. Cottrell

GARY N. COTTRELL
Chief Administrative Officer

cc: Mr. Ed Hastey
Bureau of Land Management
2800 Cottage Way, Room E-2841
Sacramento, CA 95825

Robert T. Andersen Administrative Center
4080 LEMON STREET • 12TH FLOOR • RIVERSIDE, CALIFORNIA 92501 • (714) 787-2544

APPENDICES

APPENDIX A
LIST OF PREPARERS

CALIFORNIA DESERT DISTRICT OFFICE

Staff in this office were responsible for coordination of field offices and quality control, and for preparing all sections of the document other than chapters three and four.

Name	Position	Team Assignment
Douglas Romoli	Environmental Specialist	EIS Team Leader
Larry Foreman	Wildlife Biologist	Wildlife Overview
Garth Portillo	Archaeologist	Archaeology Overview
Robert Waiwood	Geologist	GEM Overview
Clara Stapp	Illustrator	Maps, Cover

RIDGECREST RESOURCE AREA

Staff in this office were responsible for the preparation of sections concerning the North Death Valley and Hunter Mountain parcels.

Name	Position	Team Assignment
Greg Thomsen	Chief, Resources Staff	Sub-team leader
Jeff Aardahl	Wildlife Biologist	Wildlife
Eric Watkins	Natural Resource Spec	Botany
Glenn Harris	Range Conservationist	Livestock Grazing
Joan Oxendine	Archaeologist	Cultural Resources
Joe Liephauser	Realty Specialist	Lands
Mark Struble	Outdoor Recreation Planner	Recreation/Wilderness
Pete Milne	Geologist	Geology-Energy-Minerals

BARSTOW RESOURCE AREA

Staff in this office were responsible for the preparation of sections concerning the Pyramid Peak and Greenwater Valley parcels.

Name	Position	Team Assignment
Mark H. Davis	Outdoor Recreation Planner (Wilderness)	Sub-team leader/ Recreation/Wilderness
Paul McClain	Wildlife Biologist	Wildlife
Daryl Albiston	Chief, Resources Staff	Botany
Dean Huibregtse	Range Conservationist	Livestock Grazing/ Wild Horse & Burros
J. Pat Barker	Archaeologist	Cultural Resources
Mike DeKeyrel	Realty Specialist	Lands
Ken Schulte	Geologist	Geology-Energy-Minerals

INDIO RESOURCE AREA

Staff in this office were responsible for the preparation of sections concerning the Pinto Basin parcel and the Eagle Mountains alternative.

Name	Position	Team Assignment
Jim Abbott	Assistant Area Manager	Sub-Team Leader
Mike Blymer	Wildlife Biologist	Wildlife
Roland de Gouvenain	Natural Resource Specialist	Botany, Livestock, Wild Horses
Mike Mitchell	Archaeologist	Cultural Resources
John Sullivan	Realty Specialist	Lands
Donald Banks	Outdoor Recreation Planner	Recreation
Bob O'Brien	Wilderness Coordinator	Wilderness
Fred Schuster	Geologist	Geology-Energy-Minerals

CALIFORNIA STATE OFFICE

Staff in this office were responsible for review and quality control.

Name	Position	Team Assignment
Carl Rountree	Chief, Planning Staff	Lead Reviewer
Jack Mills	Environmental Specialist	Reviewer
Mike Ferguson	Wildlife Biologist	Reviewer
Bob Anderson	Associate State Director, Minerals Division	Reviewer

APPENDIX B
GLOSSARY

ADIT: A nearly horizontal passageway from the surface by which a mine is entered.

ADMINISTRATIVELY ENDORSED WILDERNESS: A National Park Service policy of wilderness management, in lieu of Congressionally designated wilderness.

ALLOTMENT: An area of land where one or more operators graze their livestock It generally consists of public lands, but may include parcels of private or state-owned lands. The number of livestock and the period of use are stipulated for each allotment. An allotment may consist of several pastures of may have only one pasture.

ANIMAL UNIT MONTH (AUM): (1) The amount of forage or feed required by an animal unit (i.e., one mature 1,000-pound cow or five domestic sheep) for one month. (2) Tenure of one animal-unit for one month.

AUTHORIZATION OF RECORD:

BARITE: Sulphate of barium, $BaSO_4$, also called Heavy-spar, from its high specific gravity. When finely ground, it is used as an ingredient in certain paints, and as a drilling additive.

BASELINE STUDIES: Inventories designed to document conditions at a certain time against which monitoring studies will later be compared.

BENTONITE: A sedimentary rock formed from the alteration in place of volcanic ash. Largely composed of the clay mineral montmorillonite. The rock commonly has a great ability to absorb water and swell.

BORATE: A mineral characterized by a fundamental structure of BO_3^{-3}. Borates are used chiefly in glass, fiberglass, ceramics, agricultural chemicals, and pharmaceuticals.

CARBONATE ROCK: A rock consisting chiefly of carbonate minerals such as limestone or dolomite.

CARRYING CAPACITY: The maximum stocking rate possible without inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production).

DEVONIAN: A period of the Paleozoic era (after the Silurian and before the Mississipian) thought to have covered a span of time between 400 and 345 million years ago.

DOLOMITE: A common rock-forming mineral: $CaMg\ (CO_3)_2$.

DRIFT: An underground horizontal passage which follows the vein.

ENDANGERED: Any animal species in danger of extinction throughout all or a significant portion of its range.

ETHNOGRAPHIC: The study of aboriginal peoples.

EXCLOSURE: An area fenced to exclude animals.

FLPMA: The Federal Land Policy and Management Act of 1976 (Public Law 94-579, 90 Stat 2743, 43 USC 1701).

FORAGE ALLOCATION: The amount of forage designated for a specific use. Use may be by wildlife and livestock, or for mulch or plant vigor.

GEOGLYPH: Large rock alignments constructed by the prehistoric inhabitants of the desert. These alignments can be representational or abstract. Their function and interpretation is unknown.

GUZZLER: A device designed to collect and store rainwater for use by wildlife.

HYDROTHERMAL: A mineral deposit precipitated from a hot agneous solution.

INTERIM MANAGEMENT POLICY (IMP): A BLM policy designed to prevent impairment (deterioration) of wilderness values between the wilderness study phase and official Congressional wilderness designation.

LODE CLAIMS: A mining claim 1,500 feet long in the direction of the vein, and extending not more than 300 feet on each side of the middle of the vein at the surface, and located on a vein or lode "of quartz or other rock in place bearing gold, silver, cinnobar, lead, tin, copper, or other valuable deposits" (30 United States Code 23).

MASTER TITLE PLATS: Public records showing the status of public land.

MESOZOIC: An era of geologic time, from the end of the Paleozoic to the beginning of the Cenozoic, or from about 225 to about 65 million years ago.

MONZONITE: A group of plutonic rocks containing approximately equal amounts of alkali feldspar and plagioclase, little or no quartz, and commonly angite as the main mafic mineral.

MULTIPLE USE CLASS (MUC): Classification of different type and level or degree of use which is permitted within a particular geographic area. The classifications were assigned by the CDCA Plan. There are four classes: class C (controlled), class L (limited), class M (moderate), and class I (Intensive). All public lands in the transfer parcels are zoned into one or another of the classes. A detailed description of each class follows:

Class C indicates the area being "preliminarily recommended" as suitable for wilderness designation.

Class L (limited use) protects sensitive, natural, scenic, ecological resource values. These lands are managed to provide for generally lower- intensity, carefully controlled multiple use of resources while ensuring that sensitive values are not significantly diminished.

Class M (moderate use) is based upon a controlled balance between higher intensity use and protection of public lands. A wide variety of present and future uses are provided for. This class is designed to conserve desert resources and to mitigate damage to those resources which permitted uses may cause.

Class I (intensive use) is designed to provide for concentrated use of the lands and resources to meet human needs. Reasonable protection would be provided for sensitive natural and cultural values. Mitigation of impacts on resources and rehabilitation of impacts areas would occur insofar as possible.

PLACER CLAIM: All forms of mineral deposit, other than veins of quartz or other rock in place, acquired by location and recordation under the authority of the General Mining Law of 1872.

PORPHRY COPPER DEPOSIT: A large body of rock that contains disseminated chalcopyrite and other sulfide minerals.

PRECAMBRIAN: All rocks formed before the Cambrian, or prior to 570 million years ago.

PUBLIC WATER RESERVE: Water sources (i.e. springs) not available for disposal under agricultural land laws or non-metalliferous (and occasionally metalliferous) mineral entry.

PYROCLASTIC: Pertaining to clastic rock material formed by volcanic explosion or aerial expulsion from a volcanic vent.

RARE: A generic term for species of limited distribution and/or abundance.

RHYOLITE: A group of extrusive igneous rocks with phenocrysts of quartz and alkali feldspar in a glassy to cryptocrystalline ground mass.

SECTION 106 CONSULTATION: Consultation between Federal agencies and the appropriate State Historic Preservation Officer to ensure adequate consideration is given to cultural resources in Federal actions. The consultation process is mandated by the National Historic Preservation Act of 1966.

SENSITIVE: A BLM designation for species which require special management attention to prevent them from being placed on the Federal endangered species list. It includes State-listed species and candidates for Federal listing.

SKARNS: A type of silicate rock composed of minerals that generally replace carbonate rock when in contact with intrusive rocks.

STOPE: An excavation from which the ore has been extracted, either above or below a level, in a series of steps.

STRONTIUM: A metallic element of the calcium group. In nature, always combined chiefly in strontianite (carbonite) and celesite (sulphate).

TAYLOR GRAZING ACT: The basic legislation authorizing the BLM to issue grazing leases and permits on public land.

TERTIARY: A period of time between 65 and 3 to 2 million years ago.

THREATENED: Any species threateded with becoming endangered.

TRANSECT: A sample of predetermined size and quality (usually linear) of a habitat or system.

TUFFACEOUS: Rock containing consolidated pyroclastic ejects.

UTILIZATION: The amount of the current year's forage production that is consumed or destroyed by animals.

ZEOLITE: A large group of white to colorless (sometimes red or yellow) hydrous aluminosilicates that are analogous in composition to the feldspars. Uses include ammonia and heavy metal adsorption.

ZOOMORPH: A motif in prehistoric rock art thought to represent an animal.

APPENDIX C
LIST OF ACCRONYMS

ACEC	Area of Critical Environmental Concern
AGL	Above Ground Level
AMP	Allotment Management Plan
AUM	Animal Unit Month
BLM	Bureau of Land Management
BOM	Bureau of Mines
CDCA	California Desert Conservation Area
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CFR	Code of Federal Regulations
DoD	Department of Defense
DVNM	Death Valley National Monument
EIS	Environmental Impact Statement
GEM	Geology-Energy-Minerals
GRA	GEM Resource Area
HMA	Herd Management Area
IMP	Interim Management Policy
JTNM	Joshua Tree National Monument
MUC	Multiple Use Class
NEPA	National Environmental Policy Act
NWF	National Wildlife Federation
NPS	National Park Service
OHV	Off Highway Vehicle
OFR	Open File Report
PL	Public Law
PWR	Public Water Reserve
UPA	Unusual Plant Assemblage
US	United States
USGS	United States Geological Survey
WSA	Wilderness Study Area

APPENDIX D

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF FISH AND GAME
1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814
(916) 445-3531

C- [illegible]
Res- Division to DM[illegible]

To		Initial	Date
1	SD	[illegible]	
	ASD		
	ADMIN		
2	RES		
	OPER		
	PA		
	Minerals		
	EEO		

Action by ______
Surname by ______
Return to ______

November 15, 1988

Mr. Ed Hastey, State Director
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Hastey:

This letter is intended to share the Department's concerns and available information related to bighorn sheep, infectious diseases and livestock with interested agencies, organizations and individuals in California. Bighorn sheep are a valuable and very popular wildlife resource. In 1986, the Legislature declared its intent to have bighorn sheep managed and maintained at sound biological levels. It also declared the State's policy to encourage the preservation, restoration and utilization of bighorn sheep. The Legislature charged the Department with the responsibility to determine the prevalence of disease and parasites within bighorn sheep populations. In response, the Department has actively pursued bighorn sheep disease investigations.

Recent events have focused additional attention on this issue. Development and review of federal land management plans, modification and renewal of livestock grazing leases on public lands and bighorn sheep reintroduction proposals have resulted in public meetings and administrative hearings where bighorn sheep and livestock relations were involved. In an effort to prevent potential misunderstanding of the Department's position and concerns, the attached summary was prepared.

If you have specific questions or comments regarding the matter, feel free to contact Eldridge Hunt, Chief of the Wildlife Management Division, by phone at (916) 445-5561 or in writing at 1416 Ninth Street, Sacramento, CA 95814. We appreciate your cooperation.

Sincerely,

for Pete Bontadelli
Director

cc: Parnell, Dir., Dept. of Food & Ag.
Molini, Dir., NV Dept. of Wildlife
Armstrong, NV Dept. of Agriculture

State of California
The Resources Agency
Department of Fish and Game

Summary Regarding

Bighorn Sheep, Infectious Diseases and Livestock

November 1988

Three races of bighorn sheep (Ovis canadensis sp.) currently live in California. Two of these races, California bighorn (O. c. californiana) and Peninsular bighorn (O. c. cremnobates) are officially listed by the Fish and Game Commission as threatened species. The Nelson bighorn (O. c. nelsoni) is fully protected, except that two populations in San Bernardino County are game mammals subject to current law with a limited hunting program. Bighorn sheep are an extremely valuable and popular natural resource to a wide range of the public. The Department has prepared a statewide strategic plan for bighorn sheep management which is intended to guide its program.

Infectious diseases appear to have historically and recently had a negative influence on bighorn sheep populations. In some cases, diseases appear to be occurring independent of bighorn density and nutritional status. In 1981, the herd of California bighorn at the Lavabeds National Monument, Siskiyou County, (approximately 42 animals) died of pneumonia over a one-month period. In the winter of 1987-88, the productive California bighorn herd in the Warner Mountains, Modoc County, which had grown from 14 to approximately 65 animals in the 8 years following reintroduction, died of pneumonia. In both cases, the die-off was preceded by contact with domestic sheep. The causative organism in both cases was Pasteurella sp. bacteria. Experimental evidence from British Columbia and Washington suggests that domestic sheep harbor Pasteurella sp. that can kill bighorn sheep, and that close contact results in transmission to and subsequent death of most or all exposed bighorn. Only one large productive population of California bighorn currently exists within the State. Despite aggressive capture and relocation efforts, the total numbers of this threatened race have not increased in the last 10 years. The total statewide population is estimated at approximately 325 animals.

Peninsular bighorn, which occupy mountain ranges in Riverside and San Diego counties, also appear to be susceptible to a variety of diseases. The most important appear to be parainfluenza III virus and bluetongue, but others (respiratory syncitial virus, epizootic hemorrhagic disease, and contagious ecthyma) may also have some effect. Pneumonia appears to occur following viral infection, most often in lambs from 2 to 4 months of age. Lamb losses are hign (often averaging 90%) and persistent, continuing for 10 years in the longest running study. Peninsular bighorn numbers were estimated at 900 animals 10 years ago. However, recent surveys indicate a declining population in several major herds, and the total may now be as low as 500 animals. Concerns in the scientific community have been raised regarding the potential for reclassifying both of the threatened races as endangered.

The source of viruses affecting bighorn sheep and much of their lifecycle is unknown. However, they are the subject of ongoing Department-sponsored and privately funded research. Field studies and survey work suggest that Nelson and Peninsular herds infected with one or more of these viruses are static or declining. Infected herds often have a history of recent or current contact with cattle. The majority of unbranded feral cattle removed from Anza Borrego State Park in 1987 had serologic evidence of exposure to the five viral diseases previously mentioned.

In general, the relationships between bighorn sheep, infectious diseases and livestock are not well understood, and many confounding variables make it difficult or impossible to conclusively prove cause and effect relationships. At this point in time, evidence is primarily circumstantial, as is much medical intelligence. In an effort to meet the Department's responsibility to protect and enhance native wildlife, this circumstantial evidence cannot be ignored.

The Department has relied on well-qualified veterinary medical expertise available in studying basic problems. Much of the disease testing has been performed through the California Veterinary Diagnostic Laboratory, which is funded by the California Department of Food and Agriculture. The departments of Fish and Game and Food and Agriculture have a long history of cooperation on diseases that may effect both livestock and wildlife. In addition, cooperative studies include work with the University of California at Davis, School of Veterinary Medicine.

There appears to be a growing concern in the livestock industry that it is being unfairly blamed for disease problems in bighorn sheep. Fear has been expressed that public land management agencies will use this opportunity to unnecessarily deny access to livestock on public land. Two recent administrative law hearings were convened to adjudicate conflicts between livestock and bighorn sheep.

The Department has supported the concept of separating livestock from bighorn sheep to create buffer zones and to reduce disease transmission potential through the private purchase of active livestock allotments or eliminating vacant livestock allotments. However, it has not been a policy to recommend removal of current livestock permittees. To make the Department's position clear and to reinforce the current working relationships between the departments of Fish and Game and Food and Agriculture, the livestock industry and wildlife interests, it is recommended that representatives of the various groups work together to improve our understanding of the following issues:

1. The status of bighorn sheep;
2. The current state of knowledge concerning the impact of infectious diseases on bighorn sheep;
3. Specific concerns related to livestock and bighorn sheep interactions;
4. Long-term plans for relocation of bighorn sheep in California and the limited amount of grazing lands that may be affected if bighorn sheep are to be separated from livestock;
5. Current bighorn sheep research and health care programs; and
6. Common interests in reducing the prevalence of infectious diseases and parasites in livestock and wildlife.

We have an important opportunity to prevent any misunderstanding of Department policies and the available scientific evidence. Interested parties working together would also provide an opportunity to forge new cooperative relationships to address issues of mutual concern. Another logical step may involve cooperation with the Nevada departments of Agriculture and Wildlife, which have expressed interest in investigating bighorn sheep and livestock health questions with California.

This summary of bighorn sheep, infectious diseases and livestock interactions is intended to clarify the Department's concerns, share information and encourage cooperation on an important issue. It is intended to focus attention on what we know as well as what we do not know about these complex problems. As our knowledge increases, information will be shared with interested agencies, organizations and individuals. The long-term welfare of our valuable bighorn sheep resource is our primary goal.

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APPENDIX F
SUMMARY OF ISSUES RAISED AT SCOPING MEETINGS

Wildlife

- Ecosystem (RivA)
  - Define "ecosystem" (I)
  - Ecosystem boundaries (PS, RD)
  - Clarify--"Perfect Death Valley as an Ecosystem" (RD)
- Wildlife management--NPS. Deer, Sheep (RivA, RivB, PS, RD)
  - Track record of NPS
  - Options available to wildlife managers
  - Sheep and deer numbers
  - BLM & Park wilderness; BLM & Park nonwilderness
- Facts on conflicts between cattle & bighorn (RD, I)
  - Bighorn are in every range in Inyo County. Why close Hunter Mountain because of bighorn?
  - Are lions detrimental to bighorns? Which agency can best handle?
- Water Development (RivA, RivB, PS, RD, I)
  - Guzzler Development
  - Guzzler Maintenance
- WL habitat improvement in general (RivA) (PS)

- States rights--Fish and Wildlife management (RivA)
- Scientific research--ability to continue (RivB)
- T&E species (RD)
- Are roads adequate boundaries for wildlife management? (RD, I)
- Hunting--management tool (RD)
  - Game birds
- Detrimental/positive effects of mining, grazing on wildlife/plants (I)
- Springs need to be managed to protect native species (I)
- Will deer be eliminated under park? Entered in 1949. (I)

Botany

- Many current boundaries not natural boundaries. Rich variety of plants need to be protected (I)
  - Milkvetch at Sand Spring
  - Hunter Mtn has several rare species
  - Red Amphitheater has several rare species
  - Funeral Mts have several rare species
  - Greenwater good flower area

Livestock Grazing

- Hunter's rights (RD)
  - Would they continue under monument? (I)
- Changing Hunter Mtn boundary affects other leases--Forest Service, Los Angeles, State, and hay ranch (200 acre) (I)
- Why after 123 years is grazing on Hunter Mtn now an issue? (I)
  - Why phase out?
  - Aren't cattle indiginous/compatible?
  - Need for beef production
- Cattle trespass into park at Hunter Mtn (I)
  - How control Hunter's cattle? (RD)
- Does removal of cattle hurt environment? (I)

Wild Horse and Burro

- Burro management--NPS/BLM (RivA, RD)

Cultural Res/Native American

- ID and protection of archaeological and historic resources (RivB, PS)
  - Archaeological resources should affect boundaries (RD)
- Park designation restricts use of land (Hunter Mtn) for pinyon nut collection by Piute Shoshone (RD, I)

Lands

- Airspace (Riv A, PS)
  - Military use levels (altitude)
  - 200 above ground level vrs 3000 AGL
- Inholdings & people using them (RivB, I)
- Existing land uses and access and how will they be effected by management changes (PS)
  - NPS management plans for the land (RD)
- Explain unchanged legal boundaries (RD)
- How coordinate--S-7, Death Valley General Plan, EIS? (RD)
- Are FLPMA rights violated by this administrative process? (I)

Recreation

- Future growth of recreation use (RivA)
- B to V race (RivA)
- Check chase race (RivA)
- Off-highway vehicle use
  - Availability of access (RivA, PS, RD)
  - Road definition--describe what's there (RivB, PS)
  - Identification of historical access routes--open/closed (PS)
  - Will existing roads be closed by NPS? (PS)
  - Would Racetrack Road remain open? Who would maintain it? (I)
  - Use of washes (RivA)
  - Undesignated campgrounds and NPS management (RivA, PS, RD, I)
  - Existing OHV routes--continued use? (RivB)
  - Would there be uncontrolled OHV use? (RivB)
- States rights--recreation (RivA)

- Rockhounding impacts (RivB, PS, RD)
- Treasure hunting/metal detecting now allowed (RD)

- Hunting and trapping (PS, I)
- Effect on trappers on Hunter Mtn. (I)
  - Pros/cons of elimination
- Backcountry use and access (RivA)

- Foreign and U.S. visitor expectations to Death Valley (RD)
- Loss of tourism money
  - Recreation, hiking, pinyon collection, etc.
- Future "quality" of visitor use (I)
  - More freedom outside parks
  - Would present "quality" of Hunter Mtn for visitors be lost?
  - Recreation use could improve w/no hunting (I)
- Consider future needs--recreation in Death Valley (RD)

Wilderness

- Wilderness--post-transfer--vehicles (RD)

Geology-Energy-Minerals

- Mineral access (RivA, RivB)
  - Must have access. Original boundaries of NM were to exclude deposits--yet now propose to put in monument
  - Limits on heavy mining machines (PS)

- Valid existing rights on mining claims (RivB)
  - Number of valid mining claims(RD)
  - Impact on them (RD)
  - Valid claims in park would continue (I)
- Nature of grandfathered mining/restoration/bonding methods (PS)
- Fair market reimbursement of minerals lost (RivB)

- Change which would result from mining (PS)

- Mineral development studies (RivB)
- Diminishing base of minerals (RivB)
  - Withdrawal of very valuable minerals (RD)
- Future economic loss from mining restrictions (I)

- Copper potential in Greenwater--needs to be open for exploration (I)
- Hunter Mtn high potential wollastonite (RivB, I)
- Little Sand Spring borates and lithium potential (I)
- Pyramid Peak clay resources (I)
- Valid mineral rights protected (I)
- High mineral potential areas important for tax base (I)
- Document proven mineral/ore reserves (I)

Water

- Existing and future water rights (RivB, PS, RD)
  - Water rights protected for people who own them (I)
- Water rights at Hunter Mtn (I)
  - What happens?
  - Effect of park on rest of operation
  - What will happen to water sources not maintained?
- Protection of water resources (PS)
- Do watershed boundaries = proposed boundaries? (RD)
- Value of future watersheds--Greenwater and N. Death Valley (I)

Socio-Economics

- Economic impact (RivB)
  - Communities
  - People
  - Impact on Inyo County (RD)
- Evaluate financial effects (I)
  - No loss from unpatented claims
  - Hunter Mtn tax loss less than $1,500

- People impact (RivB)
- Emotional affect on area citizens of changing their life style (I)

Alternatives

Include these alternatives [Joshua Tree]:
- Coxcomb Mtns (RivA, RivB, I)
- Eagle Mtns (RivB, PS, I)
- Little San Bernardino Mtns (RivA, I)

Include these alternatives [Death Valley]:
- Greenwater Range, Greenwater Canyon (RivA)
- North to Last Chance Springs (RivA, RivB, I)
- Owlshead (RivA, I)
- Eureka, Saline Valleys (RivA, RivB, RD, I)
- Crest of Panamints (RivA, RivB, I)
- Expanded Hunter Mtn (RivB)
- Amargosa River Drainage (west of highway) (RivB)

Alternatives--NPS to BLM (Riv A, RD, I))
- "Replacement" of land transferred to NMon (RivA)

No Action alternative (RivB, I)
- Very detailed inventory, study needed (I)

Why not add Nevada? (RD)
Consider S-7 boundaries (I)
All expansion should correspond to ecosystem, natural boundaries (I)

Management/Costs

Compare and contrast: NPS management vrs BLM (RivA, RivB, RD)
- Bighorn Sheep
- Livestock
- Burros
- Efficient management: Who has the better record? (PS)

Staffing--BLM and NPS abilities (PS)

Enforcement of rules and regulations (RivB)
- Will NPS be too tough on visitors? (PS)

How would Hunter Mountain improve NPS mgt and accessibility? (RD)

Proposals in NPS letter need to be examined. Some aren't true. (I)

Available dollars: NPS vrs BLM (RivA)
- Who would have more?
- Where will NPS $'s come from? (RivB, RD)
- Would budget go with land? (I)

Total cost--economic assessment (PS)
- What are admin costs?

Miscellaneous

- Use of thematic mapping (RivB)
    - "Spot" satellite mapping
    - Images (JPL)

- Cumulative impacts (RivB)
- Displaced impacts (RivB)
    - where
    - how much
    - total effect

- Visual resources (RivB, PS)
- Fire protection--NPS let burn (RD)

- Reasons for the land transfer (PS)
    - Why transfer under Antiquities Act? (RD)
- Pyramid Peak--why only one side of road? (RD)
- Topography--in relation to boundaries (RD)

Opinions

- When will continued expansion end? (RivA)

- New information vrs "votes" (RivB)

- Public lands belong to everyone across U.S. (RD)

- Object that there will be use fee (I)
- Only 0.5 percent of park now being used. So concentrated, don't need other areas added. (I)
- Congressional desig better than Executive for knowing how managed. (I)
- Loss of Desert Plan "balance" (I)
    - further encroachment
- Desert Plan also violated by this administrative process (I)
- Exchange doesn't benefit public--just agencies (I)

APPENDIX G

United States Department of the Interior

IN REPLY REFER TO:

January 6, 1989

MEMORANDUM FOR THE RECORD

From: California State Director, Bureau of Land Management (BLM)
Regional Director, Western Region, National Park Service (NPS)

Subj: Boundary Adjustments Surrounding Death Valley NM and Joshua Tree NM Within California Desert Conservation Area (CDCA)

This memorandum documents agreements reached by our field managers, following proposals for amendment to the CDCA Plan, the subsequent DEIS, and review of public comment. This memorandum will become the basis of the preferred alternative in the Final EIS.

It is understood that BLM undertook this analysis based upon issues associated with enhancing manageability to NPS units, reducing administrative costs, and facilitating resource management and protection. There are fundamental differences in our respective missions. The environmental, social, economic and management efficiency aspects of the proposed changes were all considered in the adoption of a preferred alternative for the Final EIS and as represented in this agreement. It varies from the Draft EIS based upon consideration of resource data, further review of management and administrative issues, organizational changes occurring since the NPS proposal was initially analyzed, and data obtained during public comment on the DEIS.

Following is the agreement, area by area.

1. Pyramid Peak.

From an administrative standpoint, the area can be most easily managed by NPS. Mineral values are present, but they are probably not economic. The boundary is to be adjusted by a) eliminating a sand and gravel deposit along Highway 190; and b) adding an area to Death Valley National Monument (DVNM) in the northeast to fit BLM's WSA boundary and following aliquot parts.

There is a bighorn sheep guzzler in the area which needs maintenance. (See longer description of issue under North Death Valley). As a specific mitigation measure, NPS agrees that if the area is transferred to their jurisdiction, they will maintain it as needed or allow maintenance until it is determined that the facility is no longer required. In excluding the gravel deposit, BLM agrees to manage sand and gravel extraction so as to minimize impacts on the visual quality of the new Monument boundary.

2. North Death Valley.

We agree that this northerly extension would be administratively easier to administer by NPS, since it is still Death Valley. The area is part of a natural extension of Death Valley and is clearly part of the valley. Mineral values are present but marginal. We do agree on the small adjustment to the boundary in the northwest of the proposal, eliminating a mining area. There is an issue which applies generically to all boundary extensions and is specific to this area. West of Sand Springs there is a bighorn sheep guzzler--a major installation of storage and water facilities installed cooperatively by the California Department of Fish and Game, volunteers of the Society for the Conservation of Bighorn Sheep and BLM. By this memorandum, NPS hereby agrees, as a specific mitigation measure, to maintain the existing facilities within the expansion areas, or allow volunteer maintenance by others if the expansion is ultimately approved, unless it is conclusively demonstrated that the facility is no longer needed to maintain the sheep population.

3. Hunter Mountain.

We agree that Hunter Mountain should stay with BLM. While it would extend the Death Valley story to higher elevations, it is not an integral part of the Valley. Public reaction, plus a variety of resource values and uses, indicate that multiple use management within the CDCA is most appropriate. This will allow continuation of grazing, hunting use, recreational access, and opportunity to develop mineral resources. We recognize, too, that BLM has added two new rangers at Big Pine and can now provide a greater degree of patrol and use supervision in this area.

Additionally, we agree that a cooperative management plan for this area will be developed. It will deal with eliminating cattle trespass into DVNM and minimizing the potential for disease transmitted to the native bighorn sheep population. We also agree that we need to eliminate hunter incursion into DVNM which results in poaching and illegal hunting. Fire management policy, too, must be coordinated, and a fire management plan agreed upon. A burn in the past few years has resulted in cattle use expanding and spreading into DVNM; however, moving the DVNM boundary to the Saline Valley road in Greenwater Canyon would not solve any of these issues.

Further, BLM agrees to allow NPS to propose mitigation to mining plans of operation in this area so as to protect adjacent resources within the Monument.

4. Greenwater Valley.

We agree there is now little compelling reason to include the entire initially considered area in DVNM. BLM has added two rangers at Shoshone, which now provide better use supervision. Management does agree that transfer of a small triangle of country encompassing the Greenwater Historic District, embracing about 7,850 acres, is desirable. This will eliminate a split and allow single agency interpretation. It will also allow closing and better control of access to Copper Canyon, an area of sensitive paleontological resources.

The NPS proposal to move the boundary to the Greenwater Valley Road and provide a more recognizable boundary now appears outweighed by administrative considerations associated with bringing NPS administration into an entirely new valley. Further, there are clearly numerous mining properties throughout the area, and little compelling reason to remove the area from the CDCA and multiple use management.

A cooperative management approach will be developed for this area. Since NPS objectives for the Black Mountains (within DVNM) are to retain natural bighorn sheep populations, under natural conditions, BLM agrees not to install, nor allow CDFG to install, guzzlers on the BLM administered portion of this range. BLM agrees to allow NPS to propose mitigation to all mining plans of operation in this area which will protect visual and water resources within the Monument.

5. Pinto Basin.

Management agrees that the small rectangular area adjacent to Joshua Tree National Monument, WSA 334A, is appropriate for inclusion in the Monument and logical. The larger area looked at in the DEIS is inappropriate because of roading, and extensive mining and undeveloped mineralization.

Field management did agree on a small change - to move the east boundary eastward about one-fourth mile and include all of wash in the Monument. This will clearly provide vehicular closure to the wilderness and provide a more enforceable boundary since vehicles will not be able to skirt the Monument boundary in the wash.

We concur:

Stanley Albright 1/9/89
Stanley Albright, (date)
Regional Director, Western Region
National Park Service

Ed Hastey 1/2/89
Ed Hastey, (date)
California State Director
Bureau of Land Management

GPO 687-104/19127

Form 12[illegible]
(June 1984)

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